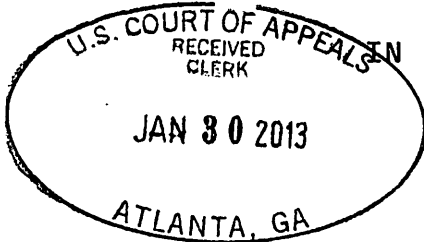


12-15027



IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

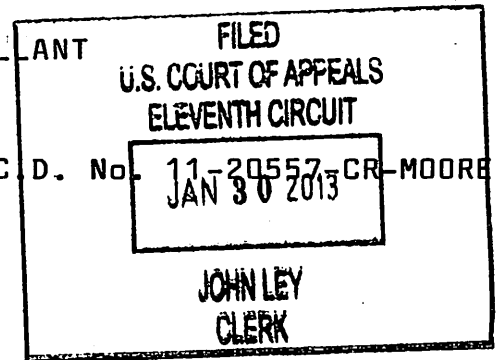
12-15027

LAVONT FLANDERS, Jr.,

APPELLANT

v.

[U.S.D.C. D. No. 11-20557-CR-MOORE]



UNITED STATES OF AMERICA,

APPELLEE

APPELLANT/PETITIONER'S APPEAL BRIEF
IN PRO-SE FORM

DATE January 25, 2013

LAVONT FLANDERS, Jr.
REG. No. 97156-004
UNITED STATES PENITENTIARY TUCSON
POST OFFICE BOX 24550
TUCSON, ARIZONA 85734-4550

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(I.)	

STATEMENT OF JURISDICTION

This case stems from Sexual Battery charges filed in the 17th Judicial Circuit in July of 2007 by Broward County States Attorney's Office. The cases were disposed of by the court with the exception of one that was set for dismissal on August 31, 2011. On August 16, 2011 the disposed cases along with the last pending Sexual Battery case was indicted by the United States Attorney for the 11th Circuit. The United States Attorney indicted the cases as Sexual Exploitation of Minors and Sex Trafficking Of Children. The United States Attorney purports on indictment only charging 18 U.S.C. §§§§ 1591; 371; 1594(c); 1594(a). While the District has jurisdiction over federal charges purported pursuant to Title 18 U.S.C. § 3231, the District Court has no jurisdiction over alledged local Sexual Assualts. The Federal Rape Statute 2031 & 2032 of chapter 99 has been repealed for years. The District has no jurisdiction over the alleged state cases. Jurisdiction lies with the United States Circuit Court Of Appeals for the Eleventh Circuit pursuant to Title 28 U.S.C. § 2191 & 18 U.S.C. § 3742 for revies and correction of the above error.

The date of judgment in this matter was February 22, 2012. The Notice Of Appeal was filed on September 14, 2012. Appellant, Lavont Flanders, Jr. is currently incaracerated as of the date of this Brief and all property seized by the FBI and Miramar Police remain in the custody of the United States Government.

STATEMENT OF ISSUES PRESENTED

- I. Whether the trial court had jurisdiction over the alledged state conduct for indictment and the seizure of property.
- II. Whether there was criminal misconduct of the Government and local police securing the indictment and the search warrant that led to the seizure of property.
- III. Whether FBI Agent Aleix Carpenter lied to Judge Ted E. Banstra in her application for a serach warrant.
- IV. Whether FBI had probable cause to search and seize the property from the home of Lucenda Roper.
- V. Whether a showing of warrant of jurisdiction in the District Court is a non-frivolous issue correctable on forfiture appeal under Fed. R. Crim. P. 52 (b)

SUMMARY OF ARGUMENTS

- I. Trial Court had no jurisdiction over the alledged state offenses indicted as Sexual Exploitation of Minors and Sex Trafficking of Children. If court had no jurisdiction then it had no legal jurisdiction to obtain the search warrant that led to the seizure of property.
- II. There was criminal misconduct on behalf of the Government and local police in obtaining the indictment that led to the seizure of property.
- III. FBI Agent Alexis Carpenter lied in her sworn application for a search warrant before Judge Ted E. Bandstra about the prostitution of minors in order to secure the search warrant that led to the seizure of property.
- IV. FBI had no probable cause to enter and search and seize property from the home of Lucenda Roper located at 2231 N.W. 192 Ter. Miami Gardens, Florida. I lived with my brother Darrell Flanders at 18411 N.W. 30th Avenue in Miami Gardens Flordia.
- V. District Court was want of jurisdiction to sit in judgement over forfeiture case that derived from perjury before a Grand Jury as well as the purported indictment being a fraud. This issues wasn't raised in the District Court so the appeal court can review for Plain Error only.

BACKGROUND STATEMENT OF CASE AND FACTS

1. Defendant Lavont Flanders, Jr. was arrested by Miramar Police and FDLE Police on July 12, 2007 for the alledged charges of **Kidnapping** , and Sexual Battery on Incapacitated Adult Women who claimed they were drugged and raped on the set of an Adult Film at a studio located in Miramar Florida. Other women claimed being drugged and raped while filming adult pornagrahpy at Motels in Broward and Miami-Dade Counties. After sworn statements of alledged victims to police recanting any crimes like the sworn statement of I.H. along with DNA and Video evidence as well as signed 2257[Adult Model Release Forms] of all the alledged victims the states cases were disposed of between 2007 and 2008. One of the alledged victims C.S. case was left open, and was headed for dismissal hearing after it was discovered the arresting agency Miramar Police had no jurisdiction for the arrest since the alledged assault occured in Miami-Dade County. The Dismissal Hearing was set for August 31, 2011. [See Case Summary Of State Charges attached as Tab.1; Model Release Form attached as Tab.2; Sworn Statement Given To Miramar Detectives attached as Tab.3]

2. Before the final hearing was contucted, defendant Flanders was indicted Federally by United States on the same women from the cases with the exception of L.W. and L.H. who are also adults and alledged the same sexual assualt conduct as the women from the state cases. The United States indicted those same cases as the Sexual Exploitaion Of Minors, and The Sex Trafficking Of Children along with Conspiracy To Commit such crimes and Attempting To Commit the above Federal offenses. [SEE: District Court Docket Sheet In Record Excerpts Tab.4] After the unsealing

and reading of the indictment directly from the Grand jury, AUSA, Roy K. Altman was allowed to exchange the True Bill from the Grand Jury similar indictment purporting similar charges with the exception of 18 U.S.C. § 2252 and it's conduct deleted from the indictment. Instead of purporting the Sex Trafficking Of Children, it purported only Sex Trafficking. This crime and misconduct was allowed by Judge Ted E. Bandstra. The Courtroom Video of the initial proceedings/hearing on August 17, 2011 will verify this fact. The indictment and FBI and FDLE reports were used to secure a search warrant wre properly was seized in the forms of DVD's; VHS tapes; Model Release Forms; Computores thumb drives with hundreds of adult photo's over 50 mini-Dv tapes and other private documents.

ARGUMENT

I. The Trial Court had no jurisdiction over the alledged state rape offenses indicted as Sexual Exploitation Of Minors and Sex TRafficking Of Children. If the court had no jurisdiction then it had no legal jurisdiction to obtain the search warrant that led to the seizure and forfeiture of property.

Standard Of Review

1. The standard of review of the District Court's jurisdiction to sit in judgment over a state's rape case prosecuted as crimes of Sexual Exploitation Of Minors, and Sex Trafficking Of Children is not clear. The Federal Prosecutor unlawfully gained Federal Jurisdiction by treating statues 2252 and 1591 as acts other than what they are, as Congress intended for them to be. None of the conduct alleged are incorporated into the indictment.

See: e.g. United States v. Frank, 599 F.3d 1221, 1233-35 (11th Cir.2010). 18 U.S.C. §§ 1512; 1512 (c) [Attached as Tab. 5]

Case: 12-10995

2. The government's use of a jurisdictionally defective indictment along with the reports from the FBI #653978AC1, and FDLE # FLO3002934, and other mis-leading allegations of crimes that led to the search and seizure and forfeiture of property. The legislative intent of § § 2252; 1591 is clear from the face of the statutes. No such conduct of either statute occurred or is alleged in the indictment, which make the indictment that of being a case of fraud [SEE: Attached Indictment Tab.6] [Also see Transcripts of Initial Preliminary Hearing, under Judge Ted E. Bandstra, and the excerpts are also attached and listed as Tab. 7]. Due to the District Court not having the proper jurisdiction over this matter, all the evidence; property taken from the home of Ms. Lucenda Roper must be returned without delay in its original form. All copies made of the property must be also returned.

II. There was criminal misconduct on behalf of the government and local police in obtaining the indictments that led to the search and seizure of property forfeited.

1. These cases were state sexual assault and the adding of kidnapping charges. Through the vindictiveness of the state and government due to the outcome of the state charges. The government along with FDLE and Miramar Police engaged in misconduct in order to obtain the indictments that led to the seizure and forfeiture of property. [SEE THE: FBI Report#653978AC1; FDLE Report# FLO3002934] Also [SEE The Grand Jury Proceedings] for verification of facts. Other document proof of facts are listed as: (1) The Court's Certified Copy Of The Pretrial Report before the Honorable Judge T.E. Bandstra dated August 17, 2011; (2) Arrest Report Filed by the FBI Agent Regino E. Chavez on August 17, 2011; (3) Court's

documents 7 and 85; (4) The FOIA excerpts of the FBI Report # 653979AC1; (5) United States Marshals Service Report # J-97156-004. The game changer to this entire governmental cover up has to be the official finger print fact sheet obtained directly from the FBI in Clarksburg, West Virginia on June 19, 2012. The official fact sheet cross references both the FBI case No. under 653978AC1 and FDLE case No. under FL030002934. The fact sheet also accurately reports all indicted crimes of the government pertaining to my finger prints as well as the agencies reporting the information and the name and location of the agencies reporting. As this Panel can plainly see from the facts sheet that on August 17, 2011 the United States Attorney's Office for the 11th Circuit report the indicted crimes of Sexual Exploitation Of A Minor-Prostitution, and Sex Trafficking Of Children, just as Judge T.E. Bandstra read from the unsealed indictment. Although AUSA Roy Altman attempts to correct the Judge as for he forgets some of the issues. The Judge forgets that the indictment came sealed before the court. That means it came directly from the Grand Jury. He also forgets to forewarn the Judge not to read the indictment revealing the true nature of the charges involving minors. Even after the long pause of Judge Bandstra, he re-reads the indictment only this time purposely changing and omitting the words minors, and children. A Key element about the charges is in the reading of the indictment the first time versus the second reading from the Judge. The fraudulent indictment was placed in the unsealed indictment envelope after we were led from the court room after the reading of the indictment with the True Bill. The fake indictment was later superseded after the AUSA discovered my

prison phone conversation with family members discussing the misconduct that occurred. Please refer to [Tab 8] concerning this above mention information. The petitioner also request that this Panel to take Judicial Notice concerning[Tab 8]. Due to the facts that misconduct was engaged in by the Government; and local Law enforcement Officers to obtain the indictments, that led to the seizure and forfeiture of property, and because of such all property seized must be returned in its original form without delay. All copies made by the governemt and local Law Enforcement Officials must also be returned without delay.

III. FBI Agent, Alexis Carpinteri lied in her Sworn Application for a search Warrant before Judge T.E. Bandstra about the 'Prostitution Of minors in order to secure the search warrant that led to the seizure and forfeiture of property.

1. On August 15, 2011, Special Agent Alexis Carpinteri of the FBI Committed perjury before Judge T. E. Bandstra in her application for a serach warrant. First and foremost, Agent Carpinteri knew no minors were involved in these cases because she had investigated the state cases prior to those charges became federal. Agent Carpinteri knew these facts prior to swearing out an affidavit before Judge Bandstra. She knew there were never any allagations of prostitution of minors or that of prostitution period prior to her making the affidavit. She knew that there were no allegations of Sexual Exploitation Of Minors mentioned in the states case or any where else for that matter. But! she gladly advises the Judge in her sworn affidavit "stated in paragraph 1"that she investigated this case as crimes involving childern.

2. In her affidavit, she uses statues 1591 and 2423 which are both statues involing the prostitution of minors, and because

these statues were used to obtain a illegal indictment/search warrant that led to the seizure and foreiture of the property, all property must be returned in its original form along with and And all copies made by the government and local Law Enforcement Officials. Agent Carpinteri committed perjury to secure the search warrant and seizure of all property.

IV. The FBI had no probable cause to enter and search and seize property from the home of Lucenda Roper located at 2231 N.W. 192nd Ter in Miami Gradens, Florida. Petitioner resided with his brother Darrell Flanders at 18411 N.W. 30th Avenue in Miami Gardens, Florida.

1. The FBI had no probable cause to search the home of Lucenda Roper. The FBI knew there were no allegations of prostitution involved in this case. They knew 18 U.S.C. § 1591 is a prostitution statute. See United States v. Todd (2010 CA9 Wash.) 627 F. 3d 329 for the perfect Congressional intent and meaning of statues. The FBI knew that there were no minors involved in this case, or the state charges as well SEE: United States v. Frank, 599 F. 3d 1221, 1233-35 (11th Cir. 2010). Because the FBI had no probable cause to secure the search warrant, all property seized and forfeited must be returned in its original form and all coies made by the government and local Law Enforcement Official must be returned as a result of illegal search and seizure.

2. The FBI had no probable cause to search and seize property from the home of Lucenda Roper, Ms. Roper, and the petitioner are engaged to be married, however Ms. roper resides in her home along with 4 children at 2231 N.W. 192nd Ter. in Miami Gardens, Florida. [SEE Tab. 8] If no allegations of prositution are alleged in the indictment or state charges by the government, then were's the probable cause to secure the search and seizure

warrant for the home of Ms. Roper? 18 U.S.C. § 1591 does not include enticing other to appear in adult sex films. The legislative and case history is clear on this point. 18 U.S.C. § 1591 is a bar against interstate enticement for prostitution. NO probable cause existed for the search and seizure warrant for the home of Ms. Lucinda Roper. All property seized and forfeited must be returned without delay in its original form. All copies made by the government and Local Law Enforcement Official as a result of the illegal search and seizure must be returned without delay.

V. The United District Court For The Southern District Of Florida Didnot Have Jurisdiction To Hear This Case.

1. The United States District Court For The Southern District Of Florida didnot have jurisdiction to sit in judgement over forfeiture case. This forfeiture case is a result of the tainted indictment secured by misconduct on behalf of the government. The indictment that the petitioner was convicted on is fraud. [SEE Indicted Charges of U.S. Attorney For The 11th Circuit in Official FBI Report, Fact Sheet, and Finger Print Background]. This issue wasn't raised in the District because it was unknown at this time. Petitioner/Appellant is respectfully requesting this Honorable Court to review under Federal Rule Of Criminal Procedure(Fed. R. Crim. P.) 52 (b). SEE: United States v. Gracia, 522 F. 3d 597, 599-600 (5th Cir.2008), and United States v. Marcus, 130 S.Ct. 2159, 176 L. Ed. 2d 1012 (2010) because of the misconduct used to obtain the indictment and the search and seizure warrant my substantial rights were a affected. The misconduct also adversely affected the fairness, integrity, and public reputation of the judicial proceedings.

Appellant Flanders has supplied this panel with official documentation that takes the guesswork away from what must have been the real indictment on 08/17/2011. One only has to look at Judge Ted E. Bandstra's recitation of two different indictments during the initial hearing on 8/17/2011 (see transcript), to know that the real indictment was for the sexual exploitation of minors and the sex trafficking of children. To add insult to injury, the government then supercedes the fake indictment with another fake indictment.

The conviction was based on a fraudulent indictment. So, it should not be a mystery to this panel as to why the government is adamantly opposed to releasing the grand jury transcripts to Appellant Flanders. The transcripts of the grand jury indictment hearing do not jibe with the charges that he was tried and convicted of, but they do jibe with the charges reported to the FBI by the 11th Circuit U.S. Attorney on 08/17/2011.

Appellant Flanders requests this panel to take judicial notice of the open disposition of the sexual exploitation of a minor and sex trafficking charges in the FBI Fact Sheet and Criminal Fingerprint background check. These charges remain open because he was never tried or convicted of the charges brought forth by the grand jury.

For all of the reasons previously stated, this forfeiture cannot stand and must be nullified.

CONCLUSION

For the reason stated in this Brief, Petitioner/Appellant Lavont Flander, Jr. respectfully request of this honorable Court to enter an order directing the government to return all property seized and forfeited along with any all copies made by the Local Law Enforcement Officials, and the government as a result of the illegal search and seizure at the home of Ms. Lucenda Roper, located at 2231 N.W. 192nd Ter. in Miami Gardens, Florida.

Respectfully Submitted

Lavont Flander, Jr.

Lavont Flanders, Jr. 97156-004
United States Penitentiary Tucson
Post Office Box 24550
Tucson, Arizona 85734-4550

Date: January 25, 2013

CERTIFICATE OF SERVICE

I, Lavont Flanders, Jr., hereby certify that I have served a true and correct copy of the foregoing: Appellant Pro-Se Brief Of Appeal

Which is deemed filed at the time it was delivered to prison authorities for forwarding to the court, Houston vs. Lack, 101 L.Ed.2d 245 (1988), upon the court and parties to litigation and/or his/her attorney(s) of record, by placing same in a sealed, postage prepaid envelope addressed to: United States Attorney's Office
For The Southern District Of Florida
99 N.E. 4th Street
Miami, Florida 33132

and deposited same in the United States Postal Mail at the United States Penitentiary,

Signed on this 25th day of January,

Respectfully Submitted,

Lavont Flanders, Jr.

REG. NO. 97156-004

U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT

Lavont Flanders vs. United States Of Amer. Appeal No. 12-15027-AA

11th Cir. R. 26.1 (enclosed) requires that a Certificate of Interested Persons and Corporate Disclosure Statement must be filed by the appellant with this court within 14 days after the date the appeal is docketed in this court, and must be included within the principal brief filed by any party, and included within any petition, answer, motion or response filed by any party. **You may use this form to fulfill this requirement.** In alphabetical order, with one name per line, please list the trial judge(s), and all attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, including subsidiaries, conglomerates, affiliates and parent corporations, including any publicly held corporation that owns 10% or more of the party's stock, and other identifiable legal entities related to a party.

(please type or print legibly):

- | | |
|--|---|
| 1) <u>Roy Altman, A.U.S.A.</u> | 11) <u>Anne R. Schultz, Appellee Attorney</u> |
| 2) <u>Sarah Bray, A.U.S.A.</u> | 12) <u>Cassique Smith, A.U.S.A.</u> |
| 3) <u>Shenese Caldwell, A.U.S.A.</u> | 13) <u>Anja Tyler, A.U.S.A.</u> |
| 4) <u>Christian Dunham</u> | 14) <u>Lucrece Williams, A.U.S.A.</u> |
| 5) <u>Laiken Harris, A.U.S.A.</u> | |
| 6) <u>Irene Heron, A.U.S.A.</u> | |
| 7) <u>Derek Lewis, Appellant Counsel</u> | |
| 8) <u>Barbara Martinez, A.U.S.A.</u> | |
| 9) <u>Michael Moore, U.S. District Court Judge</u> | |
| 10) <u>Brandine Powell</u> | |

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America

Appellee,

V.

Lavont Flanders, Jr..

Appellant..

TAB - I

State charges couldn't be prosecuted By the Broward County
State Attorneys Office. Miramar Police had no jurisdiction for
the arrest pertaining to at least three of the alleged
victims. Faced with a lawsuit they called in the Government
who also had no valid jurisdiction.

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT IN
AND FOR BROWARD COUNTY,
FLORIDA

STATE OF FLORIDA,

Plaintiff,

v.

LAVONT FLANDERS,

Defendant.

FELONY DIVISION

CASE NO: 07-13251CF10~~8~~

JUDGE SIEGAL

MOTION TO DISMISS FOR IMPROPER VENUE

COMES NOW the Defendant, LAVONT FLANDERS, by and through the undersigned attorney, pursuant to Fla.R.Cr.P. 3.190, moves this Honorable Court to enter an Order dismissing the Information filed in this cause. As grounds for this Motion, the Defendant states as follows:

The following represent material facts of this case which are undisputed. They do not establish that any crime was committed in Broward County.

1. Defendant, Lavont Flanders, was arrested and charged by way of Information with two counts of sexual battery of an intoxicated person pursuant to Florida Statutes Section 794.011(4)(d), possession with intent to deliver a controlled substance pursuant to Florida Statutes 893.13, and conspiracy to commit sexual battery pursuant to Florida Statutes Section 777.04. The Information alleges that these acts occurred solely within the jurisdiction of Broward County.

2. The victim, Casique Smith, stated in her deposition that she went to a motel or hotel, on the second floor, and that is where the sexual acts occurred. (Casique Smith Sworn Statement dated 03/26/07 page 10).

3. On December 29th, 2010, Casique Smith identified a motel as the location where the sexual acts occurred.(Casique Smith Deposition dated 12/29/10 pages 17-21)

4. The hotel identified by Casique Smith is Motel Seven, 13445 NW 7th Ave, Miami, Florida 33168, and is located in Dade County. (See receipt from Motel Seven from the night in question attached hereto as Exhibit "A").

5. Article I, Section 16(a) of the Florida Constitution provides: In all criminal prosecutions the accused shall.. have a speedy and public trial by an impartial jury *in the county where the crime was committed...*

6. The state is unable to show that the any of the elements of the offenses alleged in the indictment occurred in Broward County. In order to obtain a conviction, the state must prove venue. *McClellion v. State*, 858 So.2d 380, at 381 (Fla 4th DCA 2003).

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter an Order granting this Motion To Dismiss.

I HEREBY CERTIFY that a true copy of the foregoing Motion was furnished by hand to the Office of the State Attorney, Broward County Courthouse, Fort Lauderdale, Florida, this 15 day of AUG, 2011

Respectfully submitted,

THE LAW OFFICES OF
FISHER & LAWRENCE, P.A.
80 NE 168TH STREET
NORTH MIAMI, FL. 33162
(305) 899-5012

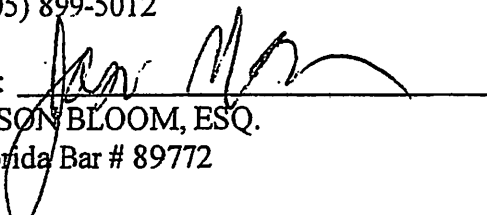
By: 
JASON BLOOM, ESQ.
Florida Bar # 89772

EXHIBIT "A"

MOTEL SEVEN
13445 NW 7TH AVE
N. MIAMI, FL 33168

RECEIPT

DATE <u>3/18/07</u>		No. <u>121717</u>	
RECEIVED FROM <u>Emerson Callum</u>		<u>\$30.⁰⁰</u>	
<u>Thirty and ⁰⁰/₁₀₀</u>		DOLLARS	
<input type="radio"/> FOR RENT		<u>Rm # 205</u>	
<input type="radio"/> FOR			
ACCOUNT		<input type="radio"/> CASH	FROM <u>3/18</u> TO <u>3/18</u>
PAYMENT		<input type="radio"/> MONEY ORDER	
BAL. DUE		<input type="radio"/> CHECK	BY <u>Angela</u>
		<input type="radio"/> CREDIT CARD	

1182

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL
CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

FELONY DIVISION

Plaintiff,

CASE NO: 07-13251CF10~~2~~

v.

JUDGE SIEGAL

LAVONT FLANDERS,

Defendant.

MOTION TO DISMISS PURSUANT TO *SHELTON V. D.O.C.*

The Defendant, **LAVONT FLANDERS**, by and through her undersigned counsel moves this Honorable Court to grant this Motion to Dismiss, pursuant to Fl. R. Crim. P. 3.190, and submits the following in support thereof:

1. Mr. Flanders is charged pursuant to Fla. Stat. 893.13(1)(a)(2) with one count of possession of Alzaprolam with intent.
2. On July 27th, 2011, the United States District Court for the Middle District of Florida issued an order finding that Fla. Stat. 893.13 is "unconstitutional on its face." *Shelton v. Secretary, D.O.C.*, Case No. 6:07-cv-839-Orl-35-KRS. (See attached Order, p. 1, 43).
3. By the Florida Legislature's 2002 enactment of the statute, Florida became the only state in the nation expressly to eliminate *mens rea* as an element of a drug offense.
4. The above cited statute, as enacted in 2002, is in direct contradiction to the due process principles of the United States Constitution in that it undermines the essential nexus between a culpable mental state and a wrongful act.

5. Binding upon this Court, the United States District Court has found that “[b]ecause Fla. Stat. 893.13 imposes harsh penalties, gravely besmirches an individual’s reputation, and regulates and punishes otherwise innocuous conduct without proof of knowledge or other criminal intent, the Court finds it violates the due process clause and that the statute is unconstitutional on its face.” (Order, p. 29).

6. The undersigned submits that this Honorable Court grant Defendant’s Motion to Dismiss.

WHEREFORE, the Defendant, LAVONT FLANDERS, respectfully requests that this Honorable Court grant the Defendant’s Motion to Dismiss Pursuant to *Shelton v. D.O.C.*

I HEREBY CERTIFY that a true copy of the foregoing Motion was furnished by hand to the Office of the State Attorney, Broward County Courthouse, Fort Lauderdale, Florida, this 15 day of Aug., 2011

Respectfully submitted,

THE LAW OFFICES OF
FISHER & LAWRENCE, P.A.
80 NE 168TH STREET
NORTH MIAMI, FL. 33162
(305) 899-5012

By: 
JASON BLOOM, ESQ.
Florida Bar # 89772

SEARCH RESULT

Search Criteria - Party Type: ALL | Last Name: flanders | First Name: lavont | Case Status: All

Case Number	Party Type	Style	Party D.O.B or Year of D.O.B	Court Type	Filed / Status
07013251CF10A	Defendant	State of Florida Vs. Flanders, Lavont, Jr.	10/14/1970	Felony	07/20/2007 Disposed
07013252CF10A	Defendant	State of Florida Vs. Flanders, Lavont	10/14/1970	Felony	07/20/2007 Disposed
08020383CF10A	Defendant	State of Florida Vs. Flanders, Lavont	10/14/1970	Felony	10/23/2008 Disposed
08022032CF10A	Defendant	State of Florida Vs. Flanders, Lavont	10/14/1970	Felony	11/17/2008 Disposed

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Click on the blue 'Case Number' link above to view Case Information.

[Back To](#)

MIRAMAR POLICE DEPARTMENT

PROPERTY RECEIPT

page ____ of ____ Related Case# _____

7. ☐ PROPERTY OF DECEASED ☐ TRIAL ☐ FOUND ☐ STOLEN-RECOVERED ☐ LABORATORY
☐ SAFE KEEPING ☐ FORFEITURE HOLD

2. CASE NO. 06-05-05551 3. DATE - TIME RECEIVED 06/16/2011 @ 1031 4. BIN NO. 5. OFFENSE Sex Battery

6. ADDRESS WHERE PROPERTY IMPOUNDED (GIVE EXACT LOCATION WHERE FOUND)

13900 Pembroke Rd, Miramar FL 33025

7. FOUND BY OFF. M. McQuade #381 ADDRESS PHONE NO.

8. SUSPECT(S) (GIVE FULL NAME) ADDRESS PHONE NO.

D.O.B. 7/11/66 RACE B SEX M

8A. SUSPECT(S) (GIVE FULL NAME) ADDRESS PHONE NO.

D.O.B. RACE SEX

8B. SUSPECT(S) (GIVE FULL NAME) ADDRESS PHONE NO.

D.O.B. RACE SEX

9. OWNERS NAME ADDRESS PHONE NO.

10. ITEM NO.	11. QTY.	12. DESCRIPTION
		ITEM NAME: SERIAL# MODEL# BRAND: COLOR:
216 1	1	Box of 90 DVD's (FDLE SW 39)
217 2	1	Box of 69 VHS tapes (FDLE SW 31)
218 3	1	Box of 11 partial reams, multiple loose DVD/CD's (FDLE SW 4)
219 4	1	Box of DVD inserts MNN#2 (FDLE SW 26)
220 5	1	Box of DVD inserts Eel make em square (FDLE SW 26)
221 6	1	Box of DVD inserts (FDLE SW 3)
222 7	1	Box of DVD inserts MNN#4 (FDLE SW 27)
223 8	1	Box of DVD inserts MNN#9 (FDLE SW 19)
224 9	1	Box of DVD inserts MNN#6 (FDLE SW 5)
225 10	1	Box of 65 DVD's (FDLE SW 43)

COMMENTS: Transferred from FDLE to Miramar PD by SA Bonilla

#3-ROOMS OF DVD pictures

FINAL DISPOSITION OF CASE:

13. I HEREBY ACKNOWLEDGE THAT THE ABOVE LIST REPRESENTS ALL PROPERTY TAKEN FROM MY POSSESSION AND THAT I HAVE RECEIVED A COPY OF THIS RECEIPT.

Det. Fletcher

SIGNATURE (x) _____

14. I HEREBY ACKNOWLEDGE THAT THE ABOVE LIST REPRESENTS ALL PROPERTY IMPOUNDED BY ME IN THE OFFICIAL PERFORMANCE OF MY DUTY AS A MIRAMAR POLICE OFFICER.

DIVISION CTD BADGE NO. 381

IMPOUNDING OFFICER (x) _____

15. RECEIVED BY REASON DATE AND TIME RECEIVED

15A.

15B.

15C. SW001959

15D.

MIRAMAR POLICE DEPARTMENT

PROPERTY RECEIPT

page _____ of _____ Related Case# _____

1. ☒ PROPERTY OF DECEASED ☐ TRIAL ☐ FOUND ☐ STOLEN-RECOVERED ☐ LABORATORY
☐ SAFE KEEPING ☐ FORFEITURE HOLD

2. CASE NO. 06-05-05551 3. DATE - TIME RECEIVED 06/16/2011 @ 1031 4. BIN NO. 5. OFFENSE Sex Battery

6. ADDRESS WHERE PROPERTY IMPOUNDED (GIVE EXACT LOCATION WHERE FOUND)

13900 Pembroke Rd, Miramar FL 33025

7. FOUND BY OFF. M. McQuade #381 ADDRESS PHONE NO.

8. SUSPECT(S) (GIVE FULL NAME) ADDRESS PHONE NO.

D.O.B. 7/11/66 RACE B SEX M

8A. SUSPECT(S) (GIVE FULL NAME) ADDRESS PHONE NO.

D.O.B. RACE SEX ADDRESS PHONE NO.

8B. SUSPECT(S) (GIVE FULL NAME) ADDRESS PHONE NO.

D.O.B. RACE SEX ADDRESS PHONE NO.

9. OWNERS NAME ADDRESS PHONE NO.

10. ITEM NO.	11. QTY.	12. DESCRIPTION	MODEL#	BRAND:	COLOR:
226 1	1	Canon digital video camera		(FDLE SW 48)	
227 2	1	Canon DVD camcorder		(FDLE SW 12)	
228 3	1	Box of loose pills, prescription bottles, Olympus digital camera		(FDLE SW 1)	
229 4	1	Box of 25 DVD's		(FDLE SW 17)	
230 5	1	Misc Unknown pills to be tested		(FDLE SW 22)	
231 6	1	Misc paperwork, DVD covers & mail copy		(FDLE SW 2)	
232 7	1	Misc documents		(FDLE SW 23)	
233 8	1	Pornographic photos		(FDLE SW 21)	

Last Item

COMMENTS: Transferred from FDLE to Miramar PD by SA Bonilla

FINAL DISPOSITION OF CASE:

13. I HEREBY ACKNOWLEDGE THAT THE ABOVE LIST REPRESENTS ALL PROPERTY TAKEN FROM MY POSSESSION AND THAT I HAVE RECEIVED A COPY OF THIS RECEIPT.

Det. Fletcher

SIGNATURE (x) _____

14. I HEREBY ACKNOWLEDGE THAT THE ABOVE LIST REPRESENTS ALL PROPERTY IMPOUNDED BY ME IN THE OFFICIAL PERFORMANCE OF MY DUTY AS A MIRAMAR POLICE OFFICER.

DIVISION CID. BADGE NO. 381

IMPOUNDING OFFICER (x) _____

15. RECEIVED BY REASON DATE AND TIME RECEIVED

15A. _____

15B. _____

15C. _____

SW001960

15D. _____

CHAPTER 99 RAPE [REPEALED]

[§ 2031. Repealed]

[§ 2032. Repealed]

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America

Appellee,

V.

Lavont Flanders, Jr.

Appellant.

TAB - II

All alleged victims willfully signed 2257 Adult Model Release Forms that are standard in the Adult Filming Industry. All the alleged victims are on video willfully consenting to act in the Adult Film. None of the Alleged Victims are under 18 years of age. All the Actresses also provided three forms of Government Identification which is also on film.

MODEL RELEASE

In consideration for value received, I hereby give Miami Vibes Enterprise, INC., and his/her assigned heirs or legal representatives the irrevocable right to copyright, use and publish my photograph and/or video image, including advertising. This includes all forms of media with no restrictions regarding alterations, distorted representations and composites, either intentionally or otherwise. I wave my rights to approve, inspect or change the finished version or versions. I understand that during my interview I may be asked to perform any acts discussed.

I HEREBY STATE THAT I AM OVER EIGHTEEN (18) YEARS OF AGE.

Stage Name: _____

Legal Name: Casique Sheri Smith

Address: _____

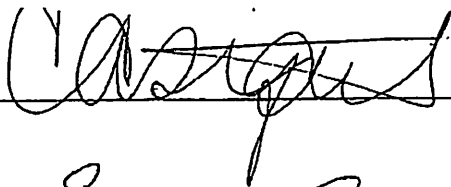
Age: 32 DOB _____

pes of 1

City/State: _____

Phone: _____

Signature: _____



3-19-07

Witnessed by: _____



ADULT MODEL RELEASE: 2257 COMPLIANT FORM.**Model Name:**

MODELS LEGAL NAME:

STAGE NAME: (IF ANY)

ALIAS: (IF ANY)

MAIDEN NAME:

PROFESSIONAL NAME:

ALSO KNOWN AS:

ALSO KNOWN AS:

If model has additional other names must include:

Laiken Tyree-Shondae Harris
Laiken Tyree

Laiken Tyree

Identification produced:

First form of identification produced:

Picture identification card:

Issued by what
government entity?

Drivers License -number

Passport

State identification card

School I.D.

Selective service card

Work Identification card

Make triplicate copies of all

Date of Birth of model

Address of model

City:

State:

driver License

Identification produced:

Second form of identification produced:

Picture identification card:

Issued by what
government entity?

Drivers License -number

Passport

State identification card

School I.D.

Selective service card

Work Identification card

Make triplicate copies of all identification produced by model

college id

Date of Birth of model

Address of model

City:

State:

TERMS AND CONDITIONS:

I, the undersigned model (hereafter model) do hereby voluntarily authorize and give permission to Company/Producer below (hereafter Producer) to the exclusive use of: photographs, video, electronic and digital reproductions in any form of my person or personal property

From the date of execution of this General Release and Authorization, the undersigned hereto does hereby grant, release and assign to Producer any and all claims of right whatsoever in and to all photographs or printed materials of the undersigned or by the undersigned and delivered to Producer for any purpose chosen by Producer.

From execution hereto and for value received and acknowledged below by model Producer shall exclusively and irrevocably own in perpetuity all right, title and interest, including copyright, in and to the digitized photographs, reproductions, video and any digitized printed material of the undersigned with no rights expressly reserved by the model.

Model also grants Producer and its designees the right to use her name, likeness, image voice, appearance, and performance as embodied in the Product whether recorded on or transferred to videotape, film, slides, photographs, audio tapes, or other media, now known or later developed. This grant includes without limitation the right to edit, mix or duplicate and to use or re-use the Product in whole or part as Producer may elect. Producer or its designee shall have complete ownership of the Product in which model appears, including copyright interests, and model acknowledges that she has no interest or ownership in the Product or its copyright.

Model also confirms that she/he has the right to enter into this Agreement, that she/he is not restricted by any commitments to any parties, and that Producer has no financial commitment or obligations to me as a result of this Agreement besides the consideration already paid.

I hereby give all clearances, copyright and otherwise, for use of my name likeness, image voice, appearance and performance embodied in the Product. I expressly release and indemnify Producer and its officers, employees, agents and designees from any and all claims known and unknown arising out of or in any way connected with the above granted uses and representations. The rights granted Producer herein are perpetual and worldwide survive my death and any other occurrence.

In consideration of all the above, I hereby acknowledge receipt of reasonable and fair consideration from the Producer received and paid.

AS TO MODEL

MODEL'S SIGNATURE

Dated on: 2/17/11

I the above signed model do hereby certify and swear under unsworn declaration of perjury that the following is true and correct by my above signature and that I agree with such terms.

I swear that I am above 18 years of age

I swear that I have disclosed my correct legal name

I swear that I have disclosed all other names that I have been known by to producer

I swear that I have produced a legal identification card

I swear that I have not provided any false or misleading information to producer

AS TO PRODUCER

Producers Name:

Company Name:

Dated on:

AS TO WITNESSES

I the undersigned witness do hereby swear under unsworn declaration of perjury that I witnessed the above model sign this documents and swear to the above statement.

WITNESS SIGNATURE

PRINTED NAME

ADDRESS CITY

ADDRESS STATE

I the undersigned witness do hereby swear under unsworn declaration of perjury that I witnessed the above model sign this documents and swear to the above statement.

WITNESS SIGNATURE

PRINTED NAME

ADDRESS CITY

ADDRESS STATE

I the undersigned witness do hereby swear under unsworn declaration of perjury that I witnessed the above model sign this documents and swear to the above statement.

WITNESS SIGNATURE

PRINTED NAME

ADDRESS CITY

ADDRESS STATE

108

ADULT MODEL RELEASE: 2257 COMPLIANT FORM:

Model Name: *Lucrece Williams*

MODELS LEGAL NAME:

Creci

STAGE NAME: (IF ANY)

ALIAS (IF ANY)

MAIDEN NAME:

PROFESSIONAL NAME:

ALSO KNOWN AS:

Same as above

ALSO KNOWN AS:

If model has additional other names must include:

Identification produced: First form of identification produced

Picture identification card:

Issued by what
government entity?

DMV

Drivers License -number

Passport

State identification card

Learners Permit

School I.D.

Selective service card

Work Identification card

*Make triplicate copies of all identification produced by model

Date of Birth of model

10/27/86

Address of model

City:

State:

Identification produced: Second form of identification produced

Picture identification card:

ID

Issued by what
government entity?

Department of Human Services

Drivers License -number

Passport

State identification card

School I.D.

Selective service card

Work Identification card

*Make triplicate copies of all identification produced by model

Date of Birth of model 10/27/1962
Address of model
City:
State:

TERMS AND CONDITIONS:

I, the undersigned model (hereafter model) do hereby voluntarily authorize and give permission to Company/Producer below (hereafter Producer) to the exclusive use of: photographs, video, electronic and digital reproductions in any form of my person or personal property

From the date of execution of this General Release and Authorization, the undersigned hereto does hereby grant, release and assign to Producer any and all claims of right whatsoever in and to all photographs or printed materials of the undersigned or by the undersigned and delivered to Producer for any purpose chosen by Producer.

From execution hereto and for value received and acknowledged below by model Producer shall exclusively and irrevocably own in perpetuity all right, title and interest, including copyright, in and to the digitized photographs, reproductions, video and any digitized printed material of the undersigned with no rights expressly reserved by the model.

Model also grants Producer and its designees the right to use her name, likeness, image voice, appearance, and performance as embodied in the Product whether recorded on or transferred to videotape, film, slides, photographs, audio tapes, or other media, now known or later developed. This grant includes without limitation the right to edit, mix or duplicate and to use or re-use the Product in whole or part as Producer may elect. Producer or its designee shall have complete ownership of the Product in which model appears, including copyright interests, and model acknowledges that she has no interest or ownership in the Product or its copyright

Model also confirms that she/he has the right to enter into this Agreement, that she/he is not restricted by any commitments to any parties, and that Producer has no financial commitment or obligations to me as a result of this Agreement besides the consideration already paid.

I hereby give all clearances, copyright and otherwise, for use of my name likeness, image voice, appearance and performance embodied in the Product. I expressly release and indemnify Producer and its officers, employees, agents and designees from any and all claims known and unknown arising out of or in any way connected with the above granted uses and representations. The rights granted Producer herein are perpetual and worldwide survive my death and any other occurrence.

In consideration of all the above, I hereby acknowledge receipt of reasonable and fair consideration from the Producer received and paid.

AS TO MODEL:

MODEL'S SIGNATURE:

Dated on:

Jorge A. Williams
8/17/10

I the above-signed model do hereby certify and swear under unsworn declaration of perjury that the following is true and correct by my above signature and that I agree with such terms.

I swear that I am above 18 years of age

I swear that I have disclosed my correct legal name

I swear that I have disclosed all other names that I have been known by to producer

I swear that I have produced a legal identification card

I swear that I have not provided any false or misleading information to producer

AS TO PRODUCER:

Producers Name: *Emerson Callum*

Company Name: *MIAMI VIBES ENTERPRISES*

Dated on: *5-17-10*

AS TO WITNESSES:

I the undersigned witness do hereby swear under unsworn declaration of perjury that I witnessed the above model sign this documents and swear to the above statement.

WITNESS SIGNATURE *Emerson Callum*

PRINTED NAME *Emerson Callum*

ADDRESS CITY *3590 S STATE ROAD 7 Suite 209*

ADDRESS STATE *MIRAMAR FL 33023*

I the undersigned witness do hereby swear under unsworn declaration of perjury that I witnessed the above model sign this documents and swear to the above statement.

WITNESS SIGNATURE

PRINTED NAME

ADDRESS CITY

ADDRESS STATE

I the undersigned witness do hereby swear under unsworn declaration of perjury that I witnessed the above model sign this documents and swear to the above statement.

WITNESS SIGNATURE

PRINTED NAME

ADDRESS CITY

ADDRESS STATE

MODEL RELEASE

In consideration for value received, I hereby give Miami Vibes Enterprise, INC., and his/her assigned heirs or legal representatives the irrevocable right to copyright, use and publish my photograph and/or video image, including advertising. This includes all forms of media with no restrictions regarding alterations, distorted representations and composites, either intentionally or otherwise. I wave my rights to approve, inspect or change the finished version or versions. I understand that during my interview I may be asked to perform any acts discussed.

I HEREBY STATE THAT I AM OVER EIGHTEEN (18) YEARS OF AGE.

Stage Name: _____ Legal Name: Shene Caldwell
Address: 1340 Springle St Age: 26 ^{03/08/80} DOB: 03/08/80 Types of ID DL
City/State: Clearwater, FL Phone: 727-531-3808
Signature: Shene Caldwell
Witnessed by: Emerson Bell

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America

Appellee,

V.

Lavont Flanders, Jr.

Appellant.

TAB-III

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America,

Appellee,

V.

Lavont Flanders, Jr.

Appellant.

TAB -- IV

CONFIDENTIAL

NOT TO BE READ BY AGENTS: This report is provided for the purpose of **BAIL REPORT DETERMINATION ONLY** and shall otherwise be confidential pursuant to: 18 USC 3153(c)(1).

FOR COURTROOM USE ONLY
RETURN TO PRETRIAL SERVICES OFFICER IMMEDIATELY AFTER HEARING
MUST NOT BE TAKEN OUT OF COURTROOM

PRETRIAL SERVICES REPORT

District/Office Southern District Of Florida/Miami Cths Court	Charge(s)(Title, Section and Description)
Judicial Officer Honorable Ted E. Bandstra	Title 18 U.S.C. § 2252 - Conspiracy to recruit, entice, harbor, transport, provide, obtain and maintain (engaging in a commercial sex act in relation to the sexual exploitation of a minor)
Docket Number (Year - Sequence No. - Def. No.) Unassigned	FACTS#: 109224

DEFENDANT

Name Flanders, Lavont	Employment Status Unemployed
Address 18411 NW 30th Avenue Miami Gardens, FL 33056 No landline at residence	
At Address Since August 2008	Time in Community Since 1995

INTRODUCTION:

The defendant was interviewed in English at the U.S. Marshals Service cell block on August 17, 2011. Although the defendant's family resides in Miami-Dade County, he could not remember any of his family members contact information.

DEFENDANT HISTORY / RESIDENCE / FAMILY TIES:

Lavont Flanders, age 40, was born in Miami, Florida on October 14, 1970. The defendant has a United States passport which was seized by the Broward State Attorney's Office due to a previous case. The defendant reported no foreign travel.

The defendant advised he resides at the above noted address with his brother and his sibling. The property were the defendant resides is owned by his brother's fiancée. As noted above, the defendant has resided in the South Florida area since 1995. For approximately 15 years, the defendant resided in Tallahassee, Florida. Otherwise, the defendant has resided in Miami.

The defendant's father, Lavont Flanders, is a 60-year-old bus driver who resides at 5655 NW 32nd Avenue, Miami, Florida. His mother, Rose Norton, passed away 39 years ago. The defendant has a brother Darryl Flanders, a 39-year-old bus driver. The defendant resides with his brother at the address noted above.

The defendant is presently divorced. He has two children, Lavont Flanders, age 13, and Lauren Flanders, age

FBI number: 653978AC1 FDLE number: FL03002934

Aliases: Cobe, Antone; Shannon, Thirteen; Griffin, Larry; Watson, Karen; Flanders, Darius; Cobe, Ladarius; Cove, Darius; Farmer, Erick; Lawson, Erick; and Liwson, Erick

Date	Agency	Charge	Disposition
01/22/1989 (Age: 18)	Jefferson County SO, FL	Disorderly Conduct	Dkt#Unknown 12/04/89: Nolle prossed
04/23/2003 (Age: 32)	Miami-Dade PD, FL	Ct.1: Aggravated Battery-Person Uses a Deadly Weapon Ct.2: Battery	Dkt#132003CR0112550001XX 05/27/04: Cts. 1&2, acquitted
10/02/2005 (Age: 34)	Miami-Dade PD, FL	False Report/Crime	Dkt#B05049926 02/06/06: Nolle prossed
07/12/2007 (Age: 36)	Miami-Dade PD, FL	Failure to Appear- Fugitive from Broward	Dkt#Unknown Disposition not reflected
07/20/2007 (Age: 36)	Broward County SO, FL	Ct.1: Kidnapping Ct.2: Sex Battery Victim Incapacitated Ct.3: Sell/Purchase/Delivery Controlled Substance Ct.4: Sale of Alcoholic Beverage to Minor	Dkt#07-013252-CF10A 08/2/07: Capias served 01/21/09: Warrant issued for pretrial release violation-failure to comply 02/05/09: Warrant withdrawn 12/08/10: Decline to adjudicate on all counts
10/23/2008 (Age: 38)	Broward County SO, FL	Ct.1: Kidnapping Ct.2: Sex Battery Victim Incapacitated Ct.3: Delivery Controlled Substance Ct.4: Criminal Conspiracy Ct.5: Sale of Alcoholic Beverage to Minor	Dkt#08-020383-CF10A 12/08/10: Decline to adjudicate all counts
11/17/2008 (Age: 38)	Broward County SO, FL	Deliver Alprazolam	Dkt#08-022032-CF10A 12/07/10: Decline to adjudicate

OFFENSE CHARGED AND CIRCUMSTANCES OF THE ARRESTS:

According to the United States Marshals Service, the defendant is being charged with conspiracy to recruit, entice, harbor, transport, provide, obtain and maintain (engaging in a commercial sex act in relation to the sexual exploitation of a minor). The circumstances of the arrest are unavailable at this time.

ASSESSMENT OF NONAPPEARANCE:

Based on the following factors, the defendant is viewed to pose a risk of nonappearance:

Possession of travel documents
Unemployment status
Financial instability
Criminal history
Failure to comply with pretrial release conditions
Failure to appear

ASSESSMENT OF DANGER:

The following factors indicate the defendant poses a danger to the community:

Nature of Offense Charged
Criminal History
Ongoing pattern of criminal activity

RECOMMENDATION:

There are no conditions or combination of conditions to reasonably assure either the defendant's appearance in court or the safety of the community. Therefore, I respectfully recommend the defendant be detained.

Pretrial Services Officer Maria Monge	Date 08/17/2011	Time 12:57
Reviewed by: Connie Irimia		

§ 2252. Certain activities relating to material involving the sexual exploitation of minors

(a) Any person who--

(1) knowingly transports or ships using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or mails, any visual depiction, if--

(A) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and

(B) such visual depiction is of such conduct;

(2) knowingly receives, or distributes, any visual depiction using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or knowingly reproduces any visual depiction for distribution using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or through the mails, if--

(A) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and

(B) such visual depiction is of such conduct;

(3) either--

(A) in the special maritime and territorial jurisdiction of the United States, or on any land or building owned by, leased to, or otherwise used by or under the control of the Government of the United States, or in the Indian country as defined in section 1151 of this title [18 USCS § 1151], knowingly sells or possesses with intent to sell any visual depiction; or

(B) knowingly sells or possesses with intent to sell any visual depiction that has been mailed, shipped, or transported using any means or facility of interstate or foreign commerce, or has been shipped or transported in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported using any means or facility of interstate or foreign commerce, including by computer, if--

(i) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and

(ii) such visual depiction is of such conduct; or

(4) either--

(A) in the special maritime and territorial jurisdiction of the United States, or on any land or building owned by, leased to, or otherwise used by or under the control of the Government of the United States, or in the Indian country as defined in section 1151 of

this title [18 USCS § 1151], knowingly possesses, or knowingly accesses with intent to view, 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction; or

(B) knowingly possesses, or knowingly accesses with intent to view, 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer, if--

- (i) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and
- (ii) such visual depiction is of such conduct;

shall be punished as provided in subsection (b) of this section.

(b) (1) Whoever violates, or attempts or conspires to violate, paragraph (1), (2), or (3) of subsection (a) shall be fined under this title and imprisoned not less than 5 years and not more than 20 years, but if such person has a prior conviction under this chapter, section 1591 [18 USCS § 1591], chapter 71, chapter 109A, or chapter 117 [18 USCS §§ 2251 et seq., §§ 1460 et seq., 2241 et seq., or 2421 et seq.], or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, or sex trafficking of children, such person shall be fined under this title and imprisoned for not less than 15 years nor more than 40 years.

(2) Whoever violates, or attempts or conspires to violate, paragraph (4) of subsection (a) shall be fined under this title or imprisoned not more than 10 years, or both, but if such person has a prior conviction under this chapter, chapter 71, chapter 109A, or chapter 117 [18 USCS §§ 2251 et seq., §§ 1460 et seq., 2241 et seq., or 2421 et seq.], or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, such person shall be fined under this title and imprisoned for not less than 10 years nor more than 20 years.

(c) **Affirmative defense.** It shall be an affirmative defense to a charge of violating paragraph (4) of subsection (a) that the defendant--

- (1) possessed less than three matters containing any visual depiction proscribed by that paragraph; and
- (2) promptly and in good faith, and without retaining or allowing any person, other than a law

enforcement agency, to access any visual depiction or copy thereof--

(A) took reasonable steps to destroy each such visual depiction; or

(B) reported the matter to a law enforcement agency and afforded that agency access to each such visual depiction.



Name: FLANDERS,LAVONT		USMS Number: 97156-004	
-----------------------	--	------------------------	--

CTR	COURT CASE #	DISTRICT OFFICE	JUDGE	US ATTORNEY	DEFENSE ATTORNEY
1A		FL/S MIAMI			

CTR	ARREST DATE	ARRESTING AGENCY	ARREST LOCATION	WARRANT NUMBER
1A	08/17/2011	FEDERAL BUREAU OF INVESTIGATION	MIAMI FL	

CTR	CODE	OFFENSE	REMARK	DISPOSITION
1A	6407	Sexual Exploitation Of Minor -Prostitution		

III. COURT CASE STATUS HISTORY

CTR	CC STATUS	START DATE	END DATE	REMARK
1A	ARREST	08/17/2011	08/17/2011	
1A	WT-TRIAL	08/17/2011	**/**/****	

IV. CHRONOLOGICAL PRISONER HISTORY

CTR: 1	CUSTODY START DATE: 08/17/2011			END DATE: **/**/****	
INST	INSTITUTION NAME	ADMIT	RELEASE	BOARDED	ACTION OR DISPOSITION
MIM	FDC Miami	08/17/2011	**/**/****	16	
TOTAL DAYS BOARDED				16	(0 BND, 0 MED)

V. MEDICAL CONDITION/TREATMENT HISTORY

DATE SERVICE PROVIDED	VENDOR	SERVICE PROVIDED
//****		

Limited Official Use



Name: FLANDERS,LAVONT	USMS Number: 97156-004
-----------------------	------------------------

III. MISCELLANEOUS INFORMATION

CTR: 1	CUSTODY START DATE: 08/17/2011	END DATE: **/**/****
PROPERTY MAILINGS NO PROPERTY RECEIVED		

IV. OFFENSE INFORMATION

CTR	COURT CASE NO.	CUST DATE	ARREST AGY	STATUS	ARREST DATE
1A		08/17/2011	FEDERAL BUREAU OF INVESTIGATION	Waiting for Trial to complete	08/17/2011

OFFENSE	REMARK
6407 - Sexual Exploitation Of Minor -Prostitution	

****Limited Official Use****

10

U.S. DEPARTMENT OF JUSTICE FEDERAL BUREAU OF PRISONS

ARRESTING OFFICER WILL COMPLETE ALL REQUIRED DATA ON THIS FORM PRIOR TO COMMITTING TO MCC/MDCs. Register Number 97156-004

Name: Last Planders First Lavont Middle N/A

AKAs:

Race (Check) ☒ B ☐ W ☐ A ☐ I Sex (Check) ☒ M ☐ F Ethnic Origin (Check) ☐ Hispanic or ☐ Other D.O.B. 10/14/70 SSN: 26-57-7506 FBI: INS: Other:

CHARGES CHECK CATEGORY OF CHARGES(S): ☒ FELONY ☐ MISDEMEANOR ☐ CIVIL CONTEMPT ☐ MATERIAL WITNESS

OTHER NARRATIVE: Title: 1957 USC: sexual exploitation of a minor NARRATIVE: Title: USC:

Date of Offense: 8/17/11 Date of Arrest: 8/17/11 Place of Arrest: Miami Gardens, FL

State of Birth FL Country of Birth USA Citizenship USA Current Address 2231 NW 192 Terr Miami Gardens, FL Zip Code 33056

Height Ft: 5 In: 8 Weight 160 lbs Hair BK Eyes BR Scars / Marks / Tattoos

Injuries / Medication NONE Emergency Contact: (Name, Address, Phone Number) Darrell Planders 18411 NW 30th Ave Miami Gardens

Arraigned ☒ Y ☐ N Sentenced ☒ Y ☐ N Special Handling: ☐ Y or ☒ N Remarks:

IN IN IN IN IN

Remanding Official (Name) Sign Rene Garu Agency/District FBI / Southern FL Phone/24 Hour Number 954-551-9274 Print Rogin E. Chavez

OUT OUT OUT OUT OUT

Removing Official (Name) Sign Agency/District Phone/24 Hour Number Print

FOR BOP USE ONLY

Receiving Official (Name) Sign S. Woods Date / Time 8-17-11 Releasing Official (Name) Sign Print

Sentry Load Data: (Must Initial) Name Search Completed by: SE (OPTIONAL USE) ARS Code 11 Staff Init. SE Add AKA's Create Cash Account Deposit Cash Amt. SE Detainers Court Clothing Bag # RIGHT THUMBPRINT

Original-for ISM as Remanding-Removal receipt; Copy-for Control as Removal Receipt (NCIC); Copy-For Removing Official; Copy-for Control as Remanding Receipt (Inmate); Copy-INS-Alien in Custody.

(This form may be replicated via WP) This form replaces BP-S377(58) and BP-377(58) of JUL 91

USMS # LAST NAME FIRST MIDDLE
Flanders Lavont Noni

SEX RACE HAIR CLR EYE CLR HEIGHT WEIGHT
M B BK BR 5'8" 160lbs

DATE OF BIRTH PLACE OF BIRTH STATE CITIZENSHIP
10/14/70 USA FL USA

FBI # SOCIAL SECURITY # ALIEN # STATE/LOCAL #
266-57-7506

STREET ADDRESS APT # CITY ST ZIP PHONE #
2231 NW 192 Terr Miami Gardens FL 33056 (305)-785-0769
18411 NW 30th Ave Miami Gardens FL (954) 652 9325

MARITAL STATUS: Single

ARREST INFORMATION

AGENCY: FBI LOCATION OF ADDRESS: 1162 NW 2 Ave, Miami, FL
DATE / TIME OF ARREST: 8/17/11 6:30 AM CASE / WARRANT #:

OFFENSE

DESCRIPTION TITLE USC
Sexual exploitation of minor 18 USC 1951
TITLE USC

REMARKS:

SPECIAL HANDLING REMARKS (SEPERATIONS, MEDICAL, DRUG ADDICTIONS)?

NONE

1

22

MIMEX 600.00 * SECURITY/DESIGNATION * 08-29-2011
PAGE 001 OF 001 * DATA * 10:28:11
USCA11 Case: 12-10995 Document: 160-1 Date Filed: 01/30/2013 Page: 49 of 89
REGNO: 97156-004 NAME: FLANDERS, LAVONT ORG:
RC/SEX/AGE: B/M/40 FORM D/T: RES: MIAMI, FL 33056
OFFN/CHG.: SEXUAL EXPLOITATION MINOR

TODY...: IN BIL: CITIZENSH: UNITED STATES OF AMERICA
CJM CONS.: USM:
JUDGE....: RECFACL/PGM: VOLSUR:
VS DT/LOC: MOS REL: SEVERITY:
CHP/CHS/S: VIOLENCE: ESCAPES.:
DETAINER.: AGE: EDUC LV: HGC:
DRUG/ALC.: TOTAL: SEC LVL:
PUB SAFTY: CAR MD/MH: OMDT REF:
CCM RMKS.:

P5110 DESIGNATION RECORD DOES NOT EXIST FOR THIS INMATE

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America,

Appellee,

V.

Lavont Flanders, Jr.

Appellant.

TAB - V

COURT MINUTES
U.S. MAGISTRATE JUDGE TED E. BANDSTRA - ATKINS BLDG 7TH FL
DATE: 08/17/11 TIME: 1:30 P.M. PAGE: 1

DEFT: 1) LAVONT FLANDERS, JR.
(J)#97156-004

CASE NO 11-20557-CR-MOORE (SEALED)

AUSA: Roy Altman

ATTY: _____

AGENT: FBI

VIOL: SEXUAL EXPLOITATION OF A MINOR

PROCEEDING: INITIAL APPEARANCE

RECOMMENDED BOND: _____

BOND/PTD CONTESTED HRG - yes / no

CJA APP'T: _____

BOND SET @: _____

To be cosigned by: _____

INTERPRETER: English

☐ All Standard Conditions.

Disposition: UnSealed/open

☐ Surrender / or do not obtain passports / travel documents

Court

☐ Rpt to PTS as directed / or _____ x's a week/month
by phone; _____ x's a week/month in person

Stated J. Fisher is Counsel

☐ Refrain from excessive use of alcohol

Not Present

☐ Participate in a mental health assessment and treatment

Temp PTD Risk + danger

☐ Random urine testing by Pretrial Services and/or treatment
as deemed necessary

☐ Not to encumber property.

☐ Maintain or seek full - time employment/education.

☐ No contact with victims / witnesses.

☐ No firearms.

☐ May Not visit Transportation Establishments.

☐ Travel extended to: _____

☐ Home Confinement: Electronic Monitoring and/or Curfew _____
paid by _____

☐ Other _____

NEXT COURT APPEARANCE:

DATE:

TIME:

JUDGE:

PLACE:

REPORT RE COUNSEL: 8-22

PTD/BOND HEARING: 8-22

PRELIM/ARRAIGN. OR REMOVAL: 8-22

STATUS CONFERENCE _____

TAPE No.
DAR

11- E-

134355-1350 29

TIME IN COURT:

8

COURT MINUTES

Magistrate Judge Barry L. Garber

King Building Courthouse - Room 1061

Date: 10/26/2011 Time: 10:00 A.M.

Defendant: Lavont Flanders J#: 97156-004 Case #: 11-20557-cr-Moore

AUSA: Greg Altman Attorney: Christian Dunham

Violation: Sex trafficking of children

Proceeding: Bond Hearing PTD

CJA Appt: _____

Bond/PTD Held: ☒ Yes ☐ No Recommended Bond: PTD

Bond Set at: PTD - risk & danger Co-signed by: _____

☒ Surrender and/or do not obtain passports/travel docs

☒ Report to PTS as directed/or _____ x's a week/month by phone: _____ x's a week/month in person

☒ Random urine testing by Pretrial Services _____
Treatment as deemed necessary

☒ Refrain from excessive use of alcohol

☒ Participate in mental health assessment & treatment

☒ Maintain or seek full-time employment/education

☒ No contact with victims/witnesses, except through counsel

☒ No firearms

☒ Not to encumber property

☒ May not visit transportation establishments

☒ Home Confinement/Electronic Monitoring and/or
Curfew _____ pm to _____ am, paid by _____

☒ Allowances: Medical needs, court appearances, attorney visits, religious, employment

☒ Travel extended to: _____

☒ Other: _____

Language: English

Disposition:

(Arraigned 10/26/11)

PTD hrg. held

Arkt: Fletcher,
Detective - Miramar
Police Dept. sworn &
testified.

Def detained -
risk & danger

NEXT COURT APPEARANCE

Date:

Time:

Judge:

Place:

Report RE Counsel: _____

PTD/Bond Hearing: _____

Prelim/Arraign or Removal: _____

Status Conference RE: _____

D.A.R. 10:48:50

Time in Court: 45 min

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America

Appellee,

V.

Lavont Flanders, Jr.

Appellant.

TAB - VI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **11-20557 CR-MOORE**

/TORRES

IN RE SEALED INDICTMENT

UNITED STATES OF AMERICA

vs.

LAVONT FLANDERS, JR.

a/k/a "Antone Cobe"

a/k/a "Shannon"

a/k/a "Larry Griffin"

a/k/a "Karen Watson"

a/k/a "Darius"

a/k/a "Ladarius Cobe"

a/k/a "Darius Cove"

a/k/a "Errick Farmer"

a/k/a "Eric Lawson"

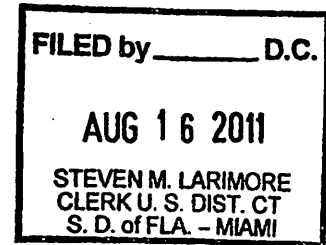
a/k/a "Erick Liwson"

a/k/a "Tina Clintmore," and

EMERSON CALLUM

a/k/a "Jah-T,"

Defendants.



SEALED ORDER

The United States of America, having applied to this Court for an Order sealing the indictment, arrest warrants, and this Order, and the Court finding good cause:

IT IS HEREBY ORDERED that the indictment, arrest warrants, and this Order shall be filed under seal until the arrest of the first defendant or until further order of this Court; however, the United States Attorney's Office may obtain copies of any indictment, arrest warrant, or other sealed document for purposes of arrest, extradition, or any other necessary cause.

DONE AND ORDERED in chambers at Miami, Florida, this 16 day of August, 2011.



TED E. BANDSTRA
UNITED STATES MAGISTRATE JUDGE

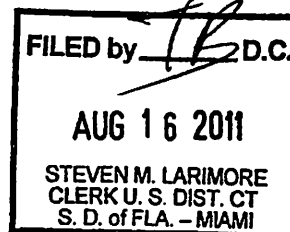
cc: Roy K. Altman
Roy.Altman@usdoj.gov
ASSISTANT UNITED STATES ATTORNEY
Court No. A5501271
99 N.E. 4th Street
Miami, FL 33132
(305) 961-9435 Office
(305) 536-4676 Facsimile

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **11-20557 CR-MOORE**

18 U.S.C. § 371
18 U.S.C. § 1591(a)(1) and (b)(1)
18 U.S.C. § 1591(a)(2) and (b)(1)
18 U.S.C. § 1594(c)
18 U.S.C. § 1594(a)
18 U.S.C. § 1594(d)
21 U.S.C. § 841(b)(2)
21 U.S.C. § 853

/TORRES



UNITED STATES OF AMERICA

vs.

LAVONT FLANDERS, JR.

a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore," and

EMERSON CALLUM

a/k/a "Jah-T,"

Defendants,

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. www.ModelMayhem.com was a social networking website tailored to men and

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 11-20557-CR-KMM (s)

18 U.S.C. § 371
18 U.S.C. § 1591(a)(1) and (b)(1)
18 U.S.C. § 1591(a)(2) and (b)(1)
18 U.S.C. § 1594(c)
18 U.S.C. § 1594(a)
18 U.S.C. § 1594(d)
21 U.S.C. § 841(b)(2)
21 U.S.C. § 853

UNITED STATES OF AMERICA

vs.

LAVONT FLANDERS, JR.

a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore"
a/k/a "Erick Blossom," and

EMERSON CALLUM

a/k/a "Jah-T,"

Defendants,

SUPERSEDING INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. www.ModelMayhem.com was a social networking website tailored to men and

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case No. 12-15027-A

United States of America,
Appellee,

V.

Lavont Flanders, Jr.
Appellant.

TAB - VII

This panel should start a Senate Investigation into the misconduct of the court due to the undisputed amount of evidence before this panel that more than proves that there was also Judicial Misconduct on behalf of Judge Ted E. Bandstra who allowed the AUSA to exchange the True Bill for the Fake Indictment. Judge K. Micheal Moore who was fully aware and authored the misconduct and who also used the power of his Office to block access to the Grand Jury Proceedings and other vital FBI reports. Judge Barry L. Garber also had first hand knowledge of the Misconduct. Barbara A. Martinez and Wilfredo A. Ferrer also knew of the criminal misconduct and acted along with Roy Altman.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No. 11-CR-20557-MOORE/BANDSTRA

THE UNITED STATES OF AMERICA,

Plaintiff,

MIAMI, FLORIDA
AUGUST 17, 2011

vs.

LAVONT FLANDERS, JR. &
EMERSON CALLUM,

Defendants

TRANSCRIPT OF INITIAL APPEARANCE HEARING
BEFORE THE HONORABLE TED E BANDSTRA,
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

FOR THE GOVERNMENT:

UNITED STATES ATTORNEY'S OFFICE
FOR THE SOUTHERN DISTRICT OF FLORIDA
99 N.E. 4th Street
Miami, Florida 33132
BY: ROY ALTMAN, A.U.S.A.

FOR THE DEFENDANTS:

(NO APPEARANCES PRESENT)

REPORTED BY:

JERALD M. MEYERS, RPR.
J.M. COURT REPORTING, INC.
1601 N.W. 109th Terrace
Pembroke Pines, Florida
Telephone: 954-431-4757
E-mail Address: CRJM@AOL.COM

1 (Call to order of the Court)

2 THE CLERK: United States of America versus Lavont
3 Flanders, Jr. and Emerson Callum, case number
4 11-20557-Criminal-Moore, and this is a sealed matter.

5 MR. ALTMAN: Good afternoon, Your Honor. Roy Altman
6 on behalf of the United States.

7 THE COURT: Mr. Altman. We will unseal the indictment
8 at this time, and I will ask each of these defendants to state
9 their name. Mr. Flanders, would you step to the microphone and
10 state your name.

11 THE DEFENDANT FLANDERS: Lavont Flanders.

12 THE COURT: And, Mr. Callum, would you do the same.

13 THE DEFENDANT CALLUM: Emerson Callum.

14 THE COURT: Mr. Flanders, you are charged in a, both
15 of you are charged in an indictment which names you both as
16 defendants, and it is the only defendants in this case.

17 The charges are summarized as sexual exploitation of a
18 minor and sex trafficking of children by force, fraud or
19 coercion.

20 MR. ALTMAN: Your Honor, as a correction, there is no
21 allegation that there were any minors involved.

22 THE COURT: All right. Then it will be sexual
23 exploitation, sex trafficking by force, fraud or coercion.

24 The indictment that I have before me charges that
25 these offenses occurred beginning at least as early as May of

1 2006 and continuing through on or about July 18th of 2007.

2 That's Count I in this county and in Broward County. That is
3 the conspiracy charge.

4 There are further charges in this indictment. Count
5 II charges from on or about May of 2006 through May 17th of
6 2006 that you together did recruit, entice, harbor transport,
7 provide and obtain a person identified by initials knowing that
8 fraud would be used to cause such person to engage in a
9 commercial sex act.

10 There is a Count III which charges you both with the
11 distribution of a controlled substance; that being Alprazolam.
12 Do you know how to say that?

13 MR. ALTMAN: Alprazolam.

14 THE COURT: Alprazolam, commonly referred to as Xanax,
15 and further counts, relating similar counts in this indictment.

16 You each have the right to remain silent in court.
17 Anything that you say can and might be used against you at a
18 later time. You each have the right to have attorneys present
19 with you in court. Do we have attorneys? No. We don't have
20 attorneys.

21 You each have the right to have attorneys with you
22 present in court each to select your own attorney. If you
23 cannot afford to hire attorneys, lawyers will be appointed for
24 you by the court.

25 Mr. Flanders, do you have a lawyer or money to hire a

1 lawyer?

2 THE DEFENDANT FLANDERS: I have an attorney yes, sir.

3 THE COURT: Pardon?

4 THE DEFENDANT FLANDERS: I have an attorney.

5 THE COURT: Do you know the name of the lawyer?

6 THE DEFENDANT FLANDERS: Joshua Fisher.

7 THE COURT: Fisher?

8 THE DEFENDANT FLANDERS: Yes, sir.

9 THE COURT: All right. Is he expected to be here in
10 court today with you or not?

11 THE DEFENDANT FLANDERS: No.

12 THE COURT: All right. But you expect him to be your
13 attorney in this case at a later time?

14 THE DEFENDANT FLANDERS: Yes, Your Honor.

15 THE COURT: All right. Thank you. Mr. Callum, what
16 about you? Do you have a lawyer?

17 THE DEFENDANT CALLUM: Yes, Your Honor.

18 THE COURT: Do you know his name?

19 THE DEFENDANT CALLUM: Thomas P. O'Connor.

20 THE COURT: O'Connor?

21 THE DEFENDANT CALLUM: O'Connor.

22 THE COURT: All right. And do you expect him to be in
23 court with you here today?

24 THE DEFENDANT CALLUM: No, sir.

25 THE COURT: All right. You do expect, though, that he

1 will be your attorney in this case?

2 THE DEFENDANT CALLUM: Yes, Your Honor.

3 THE COURT: All right. I am going to be setting a
4 date in just a minute for both attorneys to be present in court
5 with you, and on that same date will be the date for your
6 arraignment, assuming that they will filing and are able to
7 file permanent appearances in this court.

8 I will ask now the government's bond recommendation.

9 MR. ALTMAN: Your Honor, we are asking that both
10 defendants be detained pending their criminal trial because we
11 believe they are both a risk of flight and a danger to the
12 community.

13 THE COURT: Can the government request a continuance
14 to allow the defendants to obtain counsel?

15 MR. ALTMAN: Yes, sir. We will ask for 3 days until
16 Monday, Your Honor.

17 THE COURT: All right. Mr. Flanders and Mr. Callum,
18 you have heard through the Assistant United States Attorney
19 that the United States is requesting that you be held in
20 pretrial detention up until the time of trial.

21 You do have the right to have a hearing. It is called
22 a pretrial detention hearing, and at that hearing the court
23 would hear from the United States as to the nature of these
24 offenses and the basis of its request.

25 You then through counsel, through your attorneys,

1 would have the right to bring other matters to the attention of
2 the court that your lawyers and yourselves would believe would
3 entitle you to be released on bond conditions.

4 The government has the right under the statute to
5 request a continuance of that hearing, and you also both need
6 some time to make the arrangements for the attorneys that you
7 have told me about.

8 If on Monday, that hearing will be on Monday, which is
9 the 22nd of this month, August 22. If you find that the
10 attorneys whose names you gave me today cannot represent you
11 for whatever reason, you can either ask for additional time on
12 Monday or you can ask the Court to appoint attorneys for you at
13 that time. Do you understand that, Mr. Flanders?

14 THE DEFENDANT FLANDERS: Yes, Your Honor.

15 THE COURT: Do you have a question?

16 THE DEFENDANT FLANDERS: Yes.

17 THE COURT: What is it?

18 THE DEFENDANT FLANDERS: Why can't I be out on bond?

19 THE COURT: Because the government is requesting
20 pretrial detention. Is it on the basis of risk of flight or
21 danger to the community, or both?

22 MR. ALTMAN: Both, Your Honor.

23 THE COURT: There are two bases or two grounds that
24 the government can use to request that a defendant be held in
25 pretrial detention, and they are requesting, or the government

1 is requesting on both grounds, a risk of flight and a danger to
2 the community.

3 That's the answer to your question, but do you
4 understand the hearing will be on Monday?

5 THE DEFENDANT FLANDERS: Yes.

6 THE COURT: All right. Mr. Callum, do you understand
7 this as well?

8 THE DEFENDANT CALLUM: Yes, sir.

9 THE COURT: All right. No bond conditions will be set
10 before that time. You may both be seated at this time.
11 Monday's hearing will be for the arraignment and the pretrial
12 detention hearing.

13 THE CLERK: And the report re: counsel.

14 THE COURT: And the report re: counsel.

15 MR. ALTMAN: Thank you, Your Honor.

16 THE COURT: You are welcome.

17 (Whereupon the proceedings were concluded)
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C E R T I F I C A T E

I hereby certify that the foregoing is an accurate transcription of proceedings in the above-entitled matter.

NOVEMBER 2, 2011

S/JERALD M. MEYERS

DATE

JERALD M. MEYERS, RPR-CM

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case no. 12-15027-A

United States of America,
Appellee,

V.

Lavont Flanders, Jr.
Appellant.

TAB - VIII

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 11-20557-CR-KMM

UNITED STATES OF AMERICA

vs.

LAVONT FLANDERS, JR.

a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore"
a/k/a "Erick Blossom"
a/k/a "Gregory Bagget," and

Defendant,

**GOVERNMENT'S RESPONSE TO (1) DEFENDANT FLANDERS' MOTION FOR A
COMPETENCY EVALUATION (DE 158), AND (2) DEFENDANT FLANDERS'
MOTION FOR A CONTINUANCE**

FACTUAL BACKGROUND

The defendant was arrested on August 17, 2011, and charged with conspiring to commit, and actually committing, numerous violations of 18 U.S.C. § 1591. In short, the defendant and his co-defendant, Emerson CALLUM, perpetrated over the course of several years a complex and cynical fraud that involved luring women to South Florida by promising them an opportunity to audition for modeling roles that never existed. Once here, the defendant drugged the victims and then filmed CALLUM having sex with them – all in the hopes of later selling the video-footage of those sexual assaults over the Internet and at local pornography stores.

Prior to the defendant's trial, the undersigned requested and listened to all of the defendant's

jail calls. In doing so, one thing became obvious: The defendant was using the jail call accounts of fellow inmates whose jail calls, he believed, the undersigned would be unable to access. When the undersigned shared these suspicions with the Bureau of Prisons (BOP), the BOP ran the phone numbers of the people the defendant called most often through its jail call database. What the BOP found was that the defendant had convinced no less than five other inmates to allow him to use their accounts in order to make his more private phone calls to his girlfriend and brother.

In these recordings, the defendant appears at all times lucid and alert: asking questions about his case, instructing his girlfriend to raise certain possible defenses with his lawyers, calling into question the credibility of the victims who would be testifying against him, and ordering his friends and family to investigate what he believed to be critical faults in the Government's case. In one instance, the defendant even evinced frustration at his detention, telling his girlfriend that, if he had not been detained pending trial, he could be out investigating the case himself.

What is missing from any of these recordings, however, is any indication that the defendant's psychological faculties were in any way impaired. This is unsurprising: Although the defendant has worked for two different police departments and the Department of Homeland Security, and despite his numerous arrests, so far as the Government is aware, the defendant has never been diagnosed with any of the symptoms of any psychological disorder.

Indeed, since his arrest in this case, the defendant has met with counsel on numerous occasions and appeared in court no less than eleven (11) times – all without any indication of mental illness or mental defect of any kind.¹ So, for example, on August 17, 2011, the defendant made his initial appearance in federal court without incident. At the hearing, the defendant answered the

¹ Four pre-trial hearings and seven days of trial.

Court's questions about whether he had a lawyer cogently and concisely. Indeed, at one point, the defendant interrupted the Court and asked "Why can't I be out on bond?" DE 148 (Transcript of Defendant's Initial Appearance), at 19. When the Court explained that the Government was seeking that he be detained, the defendant indicated that he understood. One week later, on August 24, 2011, the defendant was arraigned without incident. On October 21, 2011, the defendant was arraigned on the charges contained in the Superseding Indictment – again without incident. Five days later, on October 26, 2011, the defendant was present for a length detention hearing in front of the Honorable Barry L. Garber, United States Magistrate Judge. Again, neither the defendant nor his lawyers reported any issues with his mental competence. Then, beginning on November 30, 2011, the defendant sat quietly through nearly two weeks of trial. During the course of these two weeks, the defendant appeared to take notes of the goings-on and actively conferred with his lawyers during both direct- and cross-examination. At no time did the defendant (or his lawyers) complain about his competency.

On January 13, 2012, everything changed, because, on that day, the defendant's pre-sentence investigation report, which recommended a sentencing range of between 262 and 327 months, was issued. Three days later, on January 16, 2012, the defendant wrote a letter to the Honorable Ted E. Bandstra, United States Magistrate Judge, asking for a copy of the Indictment and expressing, for the very first time, some confusion about the charges against him. (In the letter, the defendant indicated that he had been charged with sexual exploitation of a minor when, of course, he had not been). Ten days later, on January 26, 2012, the defendant filed a *pro se* motion to dismiss his attorney on the grounds that his attorney had failed to investigate the possibility that the Government had inappropriately presented evidence of child exploitation to the Grand Jury. Then, on February

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 11-20557-CR-KMM

UNITED STATES OF AMERICA

vs.

LAVONT FLANDERS, JR.

a/k/a "Antone Cobe"

a/k/a "Shannon"

a/k/a "Larry Griffin"

a/k/a "Karen Watson"

a/k/a "Darius"

a/k/a "Darius Cove"

a/k/a "Errick Farmer"

a/k/a "Eric Lawson"

a/k/a "Erick Liwson"

a/k/a "Tina Clintmore"

a/k/a "Erick Blossom"

a/k/a "Gregory Bagget," and

Defendant,

**GOVERNMENT'S RESPONSE TO DEFENDANT FLANDERS' MOTION TO DISMISS
ATTORNEY BASED ON INEFFECTIVE ASSISTANCE OF COUNSEL**

On February 2, 2012, the defendant, Lavont Flanders, Jr., filed a motion to dismiss his attorney based on what Flanders claims was his attorney's ineffective assistance. DE 148. Although the defendant's motion technically implicates only his relationship with his attorney, the United States hereby responds in order to clarify certain misstatements contained in the defendant's motion.

The defendant seeks to dismiss his counsel – and claims that his counsel was ineffective – on the grounds that his counsel did not investigate the possibility that the Government had inappropriately presented evidence of child molestation to the Grand Jury.¹ In support of his position

¹ The defendant also claims that the Government falsely told the Grand Jurors that Victim L.W. was assaulted in May of 2007, when in fact L.W. did not fly down to South Florida until May of 2010. Although the defendant cites to a portion of the Grand Jury transcript in which an FBI

that the Government presented such evidence, the defendant cites a portion of the transcript of his initial appearance before the Honorable Ted E. Bandstra, United States Magistrate Judge, where Judge Bandstra, in summarizing the charges against the defendant, mistakenly said: "Mr. Flanders, you are charged in a, both of you are charged in an indictment which names you both as defendants. . . . The charges are summarized as sexual exploitation of a minor and sex trafficking of children by force, fraud or coercion." DE 148, at 15. The defendant further claims that, during the booking process, a corrections officer also informed him that he had been charged with sexual exploitation of a minor – a fact the defendant says was confirmed by certain documents related to the case, including the pre-trial services report and the defendant's booking sheet, both of which state that the defendant had been charged with sexual exploitation of a minor. Finally, the defendant points to the fact that Special Agent Carpinteri, the FBI agent assigned to his case, works in an FBI unit that investigates crimes against children as support for his claim that the Government presented to the Grand Jury evidence of child molestation. In summary, then, the defendant seems to believe that he was tried on charges of sex trafficking of adult women, when in fact he was charged by the Grand Jury with some form of child exploitation. The defendant's position is frivolous and has no basis in fact. As a result, his counsel cannot be faulted for failing to investigate it.

To begin with, of course, the Government presented no evidence of child exploitation to the Grand Jury. To the contrary, the Government presented evidence only of the crimes charged in the Indictment (and, later, the Superseding Indictment), which, contrary to what the defendant believes,

Special Agent apparently testified that L.W. had flown down in May of 2007, this was obviously an error, either by the court reporter or by the agent. In any event, the rest of the Agent's testimony, coupled with two summary sheets provided to the Grand Jurors during their deliberations, confirmed the correct date of L.W.'s travel and assault: May 17, 2010.

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2012, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/ Roy K. Altman

Roy K. Altman

Assistant United States Attorney

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Case no. 12-15027-A

United States of America,
Appellee,

V.

Lavont Flanders, Jr.
Appellant.

TAB - IX

Roy Altman lies throughout the court record about the true charges indicted. He also lied before a Grand Jury along with the FBI Agents. This panel should also know that all reports from the FBI and FDLE show that they were investigating crimes against children. The same crimes of Sexual Exploitation of Minors-Prostitution and Sex Trafficking of Children appear in their reports that were used as evidence to secure search and seizure warrant.

AO 106 (Rev. 06/09) Application for a Search Warrant

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*

2231 NW 192nd Terrace, Miami Gardens, FL 33056,
and any electronic media contained therein.

Case No. 11-3077-Bondstra

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A.

located in the Southern District of Florida, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. Sections 1591(a)(1)
and (b)(1)

Offense Description
In or affecting interstate commerce, recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining a person, knowing that fraud would be used to cause such person to engage in a commercial sex act

The application is based on these facts:

See attached affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Alexis Carplinteri, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 08/15/2011


Judge's signature

City and state: Miami, FL

Ted E. Bandstra, United States Magistrate Judge
Printed name and title

SW001366

AFFIDAVIT

I, Alexis Carpinteri, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since January 1997. I am thus an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code. That is; I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18, United States Code, Section 1591 and Title 18, United States Code, Section 2423 et seq. I am currently assigned to the investigation of cases involving crimes against children. These investigations have included the use of surveillance techniques, undercover activities, the interviewing of subjects and witnesses, and the planning and execution of search, arrest, and seizure warrants. I have participated in investigations involving sexual assaults, pedophiles, preferential child molesters, persons who collect and distribute child pornography, and the importation and distribution of materials relating to the sexual exploitation of children. I have received training from the FBI in the areas of sexual assaults and child exploitation, and I have reviewed thousands of images and videos of child pornography in a wide variety of media forms, including computer media. I have also discussed and reviewed these materials with other law enforcement officers.

2. This affidavit is made in support of an application for a warrant authorizing the search of a residence located at 2231 NW 192nd Terrace, Miami Gardens, Florida 33056 (hereinafter "the Residence"), and any electronic media contained therein, as more particularly described in Attachment A, for the items described in Attachment B.


3. Based on the information set forth in this affidavit, there is probable cause to believe that, at the Residence, there exist fruits, instrumentalities, and evidence of violations of 18 U.S.C. §§ 1591(a)(1) and (b)(1), that is, in and affecting interstate and foreign commerce, recruiting,

- d. opening files in order to determine their contents;
- e. scanning storage areas;
- f. performing key word searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in Attachment B; and/or
- g. performing any other data analysis technique that may be necessary to locate and retrieve the evidence described in Attachment B.

CONCLUSION

59. Your Affiant therefore respectfully requests that the attached warrant be issued authorizing the search of the Premises listed in Attachment A and the seizure and search of the items listed in Attachment B.

60. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction," as defined by 18 U.S.C. § 2711. *See* 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that - has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. FURTHER YOUR AFFIANT SAYETH NAUGHT.


ALEXIS CARPINTERI, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Subscribed and Sworn to Before me this 15th day of August, 2011.


TED E. BANDSTRA
UNITED STATES MAGISTRATE JUDGE

18 U.S.C. § 1591. Sex trafficking of children or by force, fraud, or coercion

(a) Whoever knowingly—

(1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

(b) The punishment for an offense under subsection (a) is—

(1) if the offense was effected by means of force, threats of force, fraud, or coercion described in subsection (e)(2), or by any combination of such means, or if the person recruited, enticed, harbored, transported, provided, or obtained had not attained the age of 14 years at the time of such offense, by a fine under this title and imprisonment for any term of years not less than 15 or for life; or

(2) if the offense was not so effected, and the person recruited, enticed, harbored, transported, provided, or obtained had attained the age of 14 years but had not attained the age of 18 years at the time of such offense, by a fine under this title and imprisonment for not less than 10 years or for life.

(c) In a prosecution under subsection (a)(1) in which the defendant had a reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained or maintained, the Government need not prove that the defendant knew that the person had not attained the age of 18 years.

(d) Whoever obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section, shall be fined under this title, imprisoned for a term not to exceed 20 years, or both.

§ 2423. Transportation of minors

(a) **Transportation with intent to engage in criminal sexual activity.** A person who knowingly transports an individual who has not attained the age of 18 years in interstate or foreign commerce, or in any commonwealth, territory or possession of the United States, with intent that the individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, shall be fined under this title and imprisoned not less than 10 years or for life.

(b) **Travel with intent to engage in illicit sexual conduct.** A person who travels in interstate commerce or travels into the United States, or a United States citizen or an alien admitted for permanent residence in the United States who travels in foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person shall be fined under this title or imprisoned not more than 30 years, or both.

(c) **Engaging in illicit sexual conduct in foreign places.** Any United States citizen or alien admitted for permanent residence who travels in foreign commerce, and engages in any illicit sexual conduct with another person shall be fined under this title or imprisoned not more than 30 years, or both.

(d) **Ancillary offenses.** Whoever, for the purpose of commercial advantage or private financial gain, arranges, induces, procures, or facilitates the travel of a person knowing that such a person is traveling in interstate commerce or foreign commerce for the purpose of engaging in illicit sexual conduct shall be fined under this title, imprisoned not more than 30 years, or both.

(e) **Attempt and conspiracy.** Whoever attempts or conspires to violate subsection (a), (b); (c), or (d) shall be punishable in the same manner as a completed violation of that subsection.

(f) **Definition.** As used in this section, the term "illicit sexual conduct" means (1) a sexual act (as defined in section 2246 [18 USCS § 2246]) with a person under 18 years of age that would be in violation of chapter 109A [18 USCS §§ 2241 et seq.] if the sexual act occurred in the special maritime and territorial jurisdiction of the United States; or (2) any commercial sex act (as defined in section 1591 [18 USCS § 1591]) with a person under 18 years of age.

(g) **Defense.** In a prosecution under this section based on illicit sexual conduct as defined in subsection (f)(2), it is a defense, which the defendant must establish by a preponderance of the evidence, that the defendant reasonably believed that the person with whom the defendant engaged in the commercial sex act had attained the age of 18 years.

Effective Date: The effective date of this amendment is November 1, 2002.

641. Amendment: Chapter Two is amended in the heading of Part G by striking "PROSTITUTION" and inserting "COMMERCIAL SEX ACTS".

Chapter Two, Part G is amended in the heading of Subpart 1 by striking "PROSTITUTION" and inserting "A COMMERCIAL SEX ACT".

Section 2G1.1 is amended in the heading by striking "Prostitution" and inserting "A Commercial Sex Act".

Section 2G1.1(b)(1) is amended by striking "prostitution" and inserting "a commercial sex act"; by inserting "fraud," after "force,"; and by striking "by threats or drugs or in any manner".

Section 2G1.1(b)(4) is amended by striking "prostitution" each place it appears and inserting "a commercial sex act".

Section 2G1.1(b)(5) is amended by striking "prostitution" and inserting "a commercial sex act".

Section 2G1.1(c)(3) is amended by striking "prostitution" and inserting "a commercial sex act".

Section 2G1.1(d)(1) is amended by striking "prostitution" and inserting "a commercial sex act".

The Commentary to §2G1.1 captioned "Application Notes" is amended in Note 1 by inserting after "For purposes of this guideline—" the following paragraph:

"'Commercial sex act' has the meaning given that term in 18 U.S.C. § 1591(c)(1).";

and by striking the last two paragraphs as follows:

"'Promoting prostitution' means persuading, inducing, enticing, or coercing a person to engage in prostitution, or to travel to engage in, prostitution.

'Victim' means a person transported, persuaded, induced, enticed, or coerced to engage in, or travel for the purpose of engaging in, prostitution or prohibited sexual conduct, whether or not the person consented to the prostitution or prohibited sexual conduct. Accordingly, 'victim' may include an undercover law enforcement officer.",

and inserting the following:

"'Promoting a commercial sex act' means persuading, inducing, enticing, or coercing a person to engage in a commercial sex act, or to travel to engage in, a commercial sex act.

'Victim' means a person transported, persuaded, induced, enticed, or coerced to engage in, or travel for the purpose of engaging in, a commercial sex act or prohibited sexual conduct, whether

or not the person consented to the commercial sex act or prohibited sexual conduct. Accordingly, 'victim' may include an undercover law enforcement officer."

The Commentary to §2G1.1 captioned "Application Notes" is amended in Note 2 by inserting "fraud," after "force,"; and by striking "prostitution" and inserting "commercial sex act".

The Commentary to §2G1.1 captioned "Application Notes" is amended in Notes 3, 4, 7, 8, and 11 by striking "prostitution" each place it appears and inserting "a commercial sex act".

The Commentary to §2G1.1 captioned "Application Notes" is amended in Note 10 by striking "kidnaping" each place it appears and inserting "kidnapping".

The Commentary to §2G1.1 captioned "Application Notes" is amended by striking Note 12 as follows:

- "12. Upward Departure Provisions.—An upward departure may be warranted in either of the following circumstances:
- (A) The defendant was convicted under 18 U.S.C. § 1591 and the offense involved a victim who had not attained the age of 14 years.
 - (B) The offense involved more than 10 victims."

and inserting the following:

"12. Upward Departure Provision.—An upward departure may be warranted if the offense involved more than 10 victims."

* **Reason for Amendment:** This amendment ensures that appropriately severe sentences for sex trafficking crimes apply to commercial sex acts such as production of child pornography, in addition to prostitution, and also targets offenders who use fraud to entrap victims. It makes several changes to §2G1.1 (Promoting Prostitution or Prohibited Sexual Conduct) to address more adequately the portion of section 112(b) of the Victims of Trafficking and Violence Protection Act of 2000 (the "Act"), Pub. L. 106–386, pertaining to the new offense at 18 U.S.C. § 1591, which prohibits knowingly transporting or harboring any person, or benefitting from such transporting or harboring, knowing either that force, fraud, or coercion will be used to cause that person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be forced to engage in a commercial sex act.

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
CRIMINAL JUSTICE INFORMATION SERVICES DIVISION
CLARKSBURG, WV 26306

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ICN ISIS0001000022174769

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FBI - FBI/653978AC1

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US PENITENTIARY
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TUCSON, AZ 85706

HDR/2101794709881
 DATA/ISIS00010002217476979470989
 ***** CRIMINAL HISTORY RECORD *****
 DATA AS OF 2012-06-19
 ***** INTRODUCTION *****
 THIS RAP SHEET WAS PRODUCED IN RESPONSE TO THE FOLLOWING REQUEST:
 FBI NUMBER 653978AC1
 STATE ID NUMBER FL03002934 (FL)
 REQUEST ID 0022174769
 PURPOSE CODE C
 ATTENTION ISIS00010002217476979470989
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 THIS IS A MULTI-SOURCE OFFENDER RECORD. (FL)
 ***** IDENTIFICATION *****
 SUBJECT NAME(S)
 FLANDERS, LAVONT
 FLANDERS, LAVONT JR (AKA)
 SUBJECT DESCRIPTION
 FBI NUMBER
 653978AC1
 STATE ID NUMBER FL03002934 (FL)
 SOCIAL SECURITY NUMBER 0266577506
 SEX M
 RACE BLACK
 HEIGHT 5'08"
 WEIGHT 160
 EYE COLOR BROWN
 HAIR COLOR BROWN
 PLACE OF BIRTH FLORIDA
 EMPLOYMENT
 OCCUPATION BUS DRIVER
 EMPLOYER
 RESIDENCE
 RESIDENCE AS OF
 HOMELESS, MIAMI, FL
 ***** CRIMINAL HISTORY *****
 TRACKING NUMBER 001
 FIRST EVENT DATE 1989-11-22 INCIDENT DATE 1989-11-22
 ARREST DATE 1989-11-22
 ARREST CASE NUMBER 118931
 ARRESTING AGENCY FL0330000
 JEFFERSON COUNTY SHERIFF'S OFFICE
 ARREST TYPE ADULT
 CHARGE 001
 CHARGE NUMBER 118931
 CHARGE TRACKING NUMBER 0001981618

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
CRIMINAL JUSTICE INFORMATION SERVICES DIVISION
CLARKSBURG, WV 26306

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ICN ISIS0001000022174769

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NAME	FBI NO.	DATE REQUESTED
FLANDERS, LAVONT	653978AC1	2012/06/19

SEX	RACE	BIRTH DATE	HEIGHT	WEIGHT	EYES	HAIR
M	B	1970/10/14	508	160	BRO	BLK

BIRTH PLACE
FLORIDA

PATTERN CLASS	CITIZENSHIP
UP UC UP UP UP UP UC UP UP UP	UNITED STATES
UP UC UP UP UP UP UC UP UP UP	
UP UC UP UP UP UP UC UP UP UP	

* 1-ARRESTED OR RECEIVED 2011/08/17
AGENCY-FBI NORTH MIAMI BEACH (FLFBIMM00)
NAME USED-FLANDERS, LAVONT JR
CHARGE 1-CONSPIRACY TO RECRUIT, ENTICE, HARBOR, TRANSPORT,
PROVIDE, OBTAIN AND MAINTAIN A PERSON
CHARGE 2-TO BENEFIT FROM PARTICIPATION IN A VENTURE WHICH HAS
ENGAGED IN AN ACT IN VIOLATION
CHARGE 3-KNOWING THAT FRAUD WOULD BE USED TO CAUSE THAT PERSON TO
ENGAGE IN A COMMERCIAL SEX ACT

* 2-ARRESTED OR RECEIVED 2011/08/17A
AGENCY-FBI NORTH MIAMI BEACH (FLFBIMM00)
NAME USED-FLANDER, LAVONT
CHARGE 1-6407-SEXUAL EXPLOITATION OF MINOR -PROSTITUTION

PHOTO INFORMATION
1-TWO PHOTOS AVAILABLE
2-TWO PHOTOS AVAILABLE

RECORD UPDATED 2012/03/13

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CRIMINAL JUSTICE INFORMATION SERVICES DIVISION
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ICN ISIS0001000022174769

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DESCRIPTORS ON FILE ARE AS FOLLOWS:

NAME FLANDERS, LAVONT

SEX	RACE	BIRTH DATE	HEIGHT	WEIGHT	EYES	HAIR
M	B	1970/10/14	508	160	BROWN	BLACK

BIRTH CITY	BIRTH PLACE
UNREPORTED	FLORIDA

CITIZENSHIP
UNITED STATESPATTERN CLASS
UP UC UP UP UP UP UC UP UP UP
UP UC UP UP UP UP UC UP UP UP
UP UC UP UP UP UP UC UP UP UP

OTHER BIRTH DATES	SCARS-MARKS-TATTOOS	SOCIAL SECURITY	MISC NUMBERS
NONE	NONE	266-57-7506	NONE

ALIAS NAME(S)
COBE, ANTONE
COVE, DARIUS
FLANDER, LAVONT
FLANDERS, LAVONT
GRIFFIN, LARRY
LIWSON, ERICK
WATSON, KARENCOBE, LADARIUS
FARMER, ERRICK
FLANDERS, DARIUS
FLANDERS, LAVONT JR
LAWSON, ERIC
SHANNON, THIRTEEN

END OF COVER SHEET

Δ)
Δ===== CYCLE 005 =====
ΔTRACKING NUMBER 005
ΔEARLIEST EVENT DATE 2007-07-18 INCIDENT DATE 2007-07-18
Δ-----
ΔARREST DATE 2007-07-18
ΔARREST CASE NUMBER 500707308
ΔARRESTING AGENCY FL0060000
ΔBROWARD COUNTY SHERIFF'S OFFICE
ΔARREST TYPE ADULT
ΔCHARGE 001
Δ CHARGE NUMBER 500707308
ΔCHARGE TRACKING NUMBER 0609082106
Δ CHARGE LITERAL SEX ASSLT-
Δ AGENCY FL0060000
ΔBROWARD COUNTY SHERIFF'S OFFICE
Δ CHARGE DESCRIPTION SEX BATTERY VICT OVR 12 YOA SP
Δ STATUTE VICTIM 12 YOA OLDER SPECIAL CONDITIONS
Δ (FL794.011(4); FL
Δ)
Δ NCIC OFFENSE CODE 1199
Δ COUNTS 001
Δ SEVERITY FELONY
Δ ENHANCING FACTOR 1ST DEGREE
Δ DISPOSITION (OTHER 2007-07-18; UNKNOWN
Δ)
ΔCHARGE 002
Δ CHARGE NUMBER 500707308
Δ CHARGE LITERAL SEX ASSLT-
Δ AGENCY FL0060000
ΔBROWARD COUNTY SHERIFF'S OFFICE
Δ CHARGE DESCRIPTION SEX BATTERY VICT OVR 12 YOA SP
Δ STATUTE VICTIM 12 YOA OLDER SPECIAL CONDITIONS
Δ (FL794.011(4); FL
Δ)
Δ NCIC OFFENSE CODE 1199
Δ COUNTS 001
Δ SEVERITY FELONY
Δ ENHANCING FACTOR 1ST DEGREE
Δ DISPOSITION (OTHER 2007-07-18; UNKNOWN
Δ)
Δ-----
ΔPROSECUTOR DISPOSITION (CYCLE 005)
ΔPROSECUTION DATE 2007-07-18
ΔPROSECUTOR AGENCY FL006015A STATE ATTORNEY BRANCH OFFICE -
Δ POMPANO BEACH
ΔCHARGE 001
Δ CHARGE NUMBER 001
ΔCHARGE TRACKING NUMBER 0609082106
Δ CHARGE LITERAL SEX ASSLT-
Δ CHARGE DESCRIPTION SEX BATTERY VICT INCAPACITATED
Δ NCIC OFFENSE CODE 1199
Δ COUNTS 001
Δ SEVERITY FELONY
Δ ENHANCING FACTOR 1ST DEGREE
Δ DISPOSITION (DISMISSED 2010-12-07; NOLLE PROSSED
Δ)
Δ COMMENT ADDED CHARGE
ΔPROSECUTOR AGENCY FL006015A STATE ATTORNEY BRANCH OFFICE -
Δ POMPANO BEACH

ΔCHARGE 001
 Δ CHARGE NUMBER 002
 ΔCHARGE TRACKING NUMBER 0609082106
 Δ CHARGE LITERAL SEX ASSLT-
 Δ CHARGE DESCRIPTION SEX BATTERY VICT INCAPACITATED
 Δ NCIC OFFENSE CODE 1199
 Δ COUNTS 001
 Δ SEVERITY FELONY
 Δ ENHANCING FACTOR 1ST DEGREE
 Δ DISPOSITION (DISMISSED 2010-12-08; NOLLE PROSSED
 Δ)
 Δ COMMENT ADDED CHARGE
 Δ INITIATED BY PROSECUTOR
 ΔPROSECUTOR AGENCY FL006015A STATE ATTORNEY BRANCH OFFICE -
 Δ POMPANO BEACH

ΔCHARGE 002
 Δ CHARGE NUMBER 002
 ΔCHARGE TRACKING NUMBER 0609082106
 Δ CHARGE LITERAL SEX ASSLT-
 Δ CHARGE DESCRIPTION SEX BATTERY VICT INCAPACITATED
 Δ NCIC OFFENSE CODE 1199
 Δ COUNTS 001
 Δ SEVERITY FELONY
 Δ ENHANCING FACTOR 1ST DEGREE
 Δ DISPOSITION (DISMISSED 2010-12-07; NOLLE PROSSED
 Δ)
 Δ COMMENT ADDED CHARGE
 ΔPROSECUTOR AGENCY FL006015A STATE ATTORNEY BRANCH OFFICE -
 Δ POMPANO BEACH

ΔCHARGE 002
 Δ CHARGE NUMBER 002
 ΔCHARGE TRACKING NUMBER 0609082106
 Δ CHARGE LITERAL SEX ASSLT-
 Δ CHARGE DESCRIPTION SEX BATTERY VICT INCAPACITATED
 Δ NCIC OFFENSE CODE 1199
 Δ COUNTS 001
 Δ SEVERITY FELONY
 Δ ENHANCING FACTOR 1ST DEGREE
 Δ DISPOSITION (DISMISSED 2010-12-08; NOLLE PROSSED
 Δ)

Δ***** INDEX OF AGENCIES *****
 ΔAGENCY JEFFERSON COUNTY SHERIFF'S OFFICE

Δ; FL0330000;

Δ

ΔADDRESS

Δ-----
 ΔAGENCY 2ND CIRCUIT COURT - MONTICELLO

Δ; FL033015J;

Δ UNKNOWN CONTACT

ΔADDRESS

Δ-----
 ΔAGENCY MIAMI POLICE DEPARTMENT

Δ; FL0130600;

Δ UNKNOWN CONTACT

ΔADDRESS

Δ-----
 ΔAGENCY 11TH CIRCUIT COURT - MIAMI

Δ; FL013025J;

Δ COURT ADMINISTRATOR

ΔADDRESS

*

△
△AGENCY MIAMI-DADE POLICE DEPARTMENT
△; FL0130000;
△ RECORD BUREAU
△ADDRESS

△
△AGENCY STATE ATTORNEY'S OFFICE
△; FL013015A;
△ 11TH JUDICIAL CIRCUIT
△ADDRESS

△
△AGENCY BROWARD COUNTY SHERIFF'S OFFICE
△; FL0060000;
△ UNKNOWN CONTACT
△ADDRESS

△
△AGENCY STATE ATTORNEY BRANCH OFFICE - POMPANO BEACH
△;
△ FL006015A;
△ 17TH JUDICIAL CIRCUIT
△ADDRESS

△* * * END OF RECORD

FLANDER, LAVONT

266577506



NAME: ROBERT FLANDER, ARNOLD & MARSH, NEW YORK

19701014

M

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160

BRO

BLK

